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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

**AT&T'S COMMENTS ON QWEST'S BRIEF
REGARDING CHANGE MANAGEMENT**

AT&T Communications of the Mountain States, Inc. and AT&T Local Services on behalf of TCG Phoenix, (collectively, "AT&T") hereby submit their Comments on Qwest's Brief Regarding Change Management ("Qwest Brief").

I. BACKGROUND

On October 29, 2001, AT&T filed Comments on Qwest's Status Report Regarding the Change Management Process Redesign ("October Comments"). AT&T's October Comments describe the background for the Qwest Change Management Process ("CMP") Redesign and the filing of Qwest's status reports. In addition, AT&T pointed out that the majority of the "CM" issues identified by Qwest in its status report were unresolved.

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On December 7, 2001, AT&T filed its Comments on Qwest's Brief and Status Report Regarding Change Management ("December Comments"). AT&T's December Comments describe the status of CMP Redesign and identify several issues of concern to AT&T.

II. STATUTORY FRAMEWORK

The Federal Communications Commission ("FCC"), in recent orders evaluating a Bell operating company's ("BOCs") compliance with section 271 of the Telecommunications Act of 1996, has attached an appendix describing the statutory requirements that must be met for approval of a section 271 application. For example, in its recent order approving SBC Communications, Inc.'s section 271 application for Arkansas and Missouri, this analysis is contained in Appendix D.¹

A BOC must provide nondiscriminatory access to its operations support systems ("OSS") as part of its demonstration of compliance with checklist item 2.

By showing that it adequately assists competing carriers to use available OSS functions, a BOC provides evidence that it offers an efficient competitor a meaningful opportunity to compete. As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC adhered to this process over time.

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In evaluating whether a BOC's change management plan affords an efficient competitor a meaningful opportunity to compete, the Commission first assesses whether the plan is adequate. In making this determination, it assesses whether the evidence demonstrates: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the applications to determine whether competitive

¹ *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket No. 01-194, Memorandum Opinion and Order, FCC 01-338 (rel. Nov. 16, 2001).

carriers are able to combine network elements as required by the Act and the Commission's regulations.²

When evaluating Qwest's CMP, the Commission should, at a minimum, use the assessment as described by the FCC.

III. INTRODUCTION

The purpose of Qwest's Brief is to argue to this Commission that Qwest's CMP "clearly meets the standards set by the FCC for change management."³ While competitive local exchange carriers ("CLECs") and Qwest have spent a good deal of time working on the redesign of Qwest's CMP, AT&T does not agree that Qwest's CMP is compliant with the FCC's requirements. As described more fully below, much more work must be done to Qwest's CMP to meet the FCC's requirements. The redesign of CMP was necessitated by the fact that Qwest's process has been deficient for a long time. The Commission should not rush to the conclusion that CMP is now compliant when the parties are only part of the way through the redesign process. There are too many gaps at this point to accept Qwest's argument that the process is compliant.

As an initial matter, Qwest attaches as Exhibit A to the Qwest Brief a clean copy of the Master Redlined CLEC-Qwest CMP Re-Design Framework Interim Draft (the "Clean Draft CMP Document") as opposed to the redlined form of that document (the "Redlined Draft CMP Document"). AT&T objects to the use of this form of the document. With this exhibit, Qwest has taken the Redlined Draft CMP Document, accepted all changes and *deleted* all comments inside the document that reflect issues and areas of concern raised by CLECs. The point of maintaining

² *Id.*, Appendix D, at 20-23 (footnotes omitted).

³ Qwest Brief, at 1.

the Redlined Draft CMP Document in redlined form with comments included is to make clear that it is not complete and continues to require work before it can stand alone and be used to govern the CMP. Attached as Exhibit A to AT&T's Comments is the Redlined Draft CMP Document in redlined form with comments retained so the Commission has a better idea of the state of this draft.

IV. COMMENTS

Qwest's assertion that CMP meets the FCC's requirements for section 271 approval is wrong for several reasons: (a) there are many important open issues in the CMP Redesign that must be addressed (*see* CMP Issues Log⁴ and CMP Gap Analysis⁵), some of which are outlined below, including Product/Process; (b) there are many open CMP issues raised by third-party testers that require resolution; (c) impasse issues must be addressed (including those that arise later in the process); (d) the FCC's requirements for CMP are not yet met, including SATE; and (e) a complete, fully functioning CMP is necessary to support Qwest's use of its Statement of Generally Available Terms (SGAT) as part of its section 271 application.

A. Many Fundamental "Systems" Issues Remain Open In CMP Redesign

Qwest argues that CLECs and Qwest have agreed to "virtually all aspects of Qwest's CMP that applies to Qwest's operations support systems ("OSS" or "systems")."⁶ While CLECs have diligently worked with Qwest on the Redesign of CMP, the process is not complete and

⁴ See Exhibit B, CLEC-Qwest Change Management Re-design Working Sessions Core Team Issues/Action Items Log (the "CMP Issues Log").

⁵ CLECs and the Facilitator reviewed several documents and identified issues they considered to be "gaps" between what needs to be discussed in CMP Redesign and what has been discussed and documented in the Redlined Draft CMP Document (as of the date of the submissions – January 11, 2002). Each CLEC submitted its analysis and Qwest compiled all of the "gaps" in a single document referred to in these comments as the "CMP Gap Analysis". Qwest filed a copy of the CMP Gap Analysis on February 13, 2002, in a filing entitled "Qwest Corporation's Notice of Filing of Change Management Redesign Process Document."

⁶ Qwest Brief, at 1.

“virtually all aspect of Qwest’s CMP” that apply to systems have still not been addressed. A significant number of important issues remain open, as reflected in the CMP Issues Log and CMP Gap Analysis. These are issues that are fundamental to CMP and must be addressed and resolved in order to implement a redesigned CMP that deals with the concerns raised by the CLECs and meets the FCC’s mandate. To illustrate the importance of these open issues, AT&T identifies some of them below with explanatory comments:

1. Review the CR⁷ initiation process to insure that the description of the output of each step of the process is clearly defined; *i.e.*, LOE (range of hours) and affinity. (CMP Issues Log #214) If this process is to work, clear definition of outputs is needed, and an evaluation of whether those outputs meet the needs and expectations of the parties is necessary.
2. State the criteria for Deny (reasons why) for the CR process. (CMP Issues Log #118) In the Redlined Draft CMP Document, there is language that currently permits Qwest to respond to a CLEC CR with a denial.⁸ According to the CMP Issues Log, this issues was raised at the October 3, 2001, meeting, but it has still not been discussed. On the one hand, Qwest may reject CLEC CRs’; however, on the other hand, CLECs are not able to reject Qwest CRs. This fundamental imbalance continues to concern AT&T and has the potential to undermine the entire process.
3. Determine whether a process is necessary to address non-coding changes. (CMP Issues Log #139) Qwest has indicated that non-coding changes may affect a CLEC’s

⁷ AT&T uses “CR” (for Change Request) throughout this document. A CR is a form that a party seeking change in Qwest systems, product or process, populates with its request and submits to Qwest for handling in the Qwest Change Management Process.

⁸ See Redlined Draft CMP Document: (a) CLEC-Qwest Interface Change Request Initiation Process, and (b) CLEC Product/Process Change Request Initiation Process.

operations or procedures.⁹ This issue remains open and must be addressed. The fundamental question is how will Qwest know that a CLEC's operating procedures are affected by a non-coding change? Therefore, the need for notice, coordination and processes to promptly resolve problems that may arise must be addressed.

4. What are the criteria used to determine 'level of effort' (*i.e.*, S, M, L, XL) for a release? (CMP Issues Log # 146) CLECs have asked for a clearer way to understand the amount of work necessary to implement a systems CR. AT&T believes that Qwest will indicate this level of effort using number of hours necessary to complete each CR; however, there is no language to capture this in the Redlined Draft CMP Document. This needs to be discussed and language must be drafted and implemented.

5. Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site. (CMP Issues Log # 156) These are the basics of notification. CLECs continue to get notification from multiple sources within Qwest, and what one is supposed to get from whom at Qwest remains unclear. *See* Part IV.E.6 below.

6. What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? (CMP Issues Log # 158) There is such a close relationship between the CMP and the Performance Indicator Definitions ("PIDs"), and Qwest chooses to ignore them in CMP, except when it is to Qwest's advantage. For example, Qwest uses PIDs as a way to reject CLEC CRs.¹⁰ There is no way in CMP to deal with such a rejection, because CMP does not currently deal with PID changes. The

⁹ See CMP Issues Log, #137, Resolution/Remarks Column.

¹⁰ See AT&T's December Comments, Exhibit G.

parties need a process to address this issue. *See Part IV.F below.* A related point is Qwest's desire to have freedom to make any systems changes it wants to, ahead of CLEC-requested changes, because Qwest is paying money to CLECs or the state under a PID.¹¹

7. Where will a CR that impacts both an OSS interface and process be addressed – at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163) This issue was raised at the November 1, 2001, meeting and has still not been addressed. It is a real problem in CMP because CLECs often submit CRs as product/process change requests, but the resolution is a systems change or the product/process CR is closed and a systems CR is opened. For a CLEC to go two or three months on the product/process side of CMP only to have Qwest say that the CLEC should then open a systems CR and start the process again is unacceptable. This must be addressed. Attached, as Exhibit C is an e-mail from AT&T to Qwest dated January 23, 2002, setting forth observations from a CMP Product/Process Meeting held on January 16, 2002, where four issues were resolved as systems issues. This is a present recurring situation.

8. Qwest proposed to re-visit Regulatory type of changes to address performance measure obligations. (CMP Issues Log #169) This is the impasse issue Qwest identified in the Qwest Brief. Providing Qwest with this right would undermine the whole CMP. AT&T's comments on the impasse issue are provided below.

9. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. (CMP Issues Log # 196) In developing the prioritization

¹¹ This is the impasse issue discussed below.

process (not complete yet) in the CMP Redesign, CLECs sought to better understand the steps Qwest goes through in developing level of effort, business and systems requirements and packaging. Qwest has been unwilling to provide such documentation. This has slowed the process down, because CLECs keep trying to understand what goes on at Qwest in order to draft the process that will govern CMP. A related issue is # 233 on the CMP Issues Log. This is a particularly interesting issue because of Exception 3111 issued by KPMG: "Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package." Is Qwest unwilling to provide its internal documents on this topic because they do not, in fact, exist?

10. Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it. (CMP Issues Log # 216) This is an extremely important issue, because going to CMP takes a good deal of time. If an issue can be resolved by the Qwest account team or service manager, resolution should be much faster. AT&T's experience is that Qwest's initial reaction is to push issues to CMP. This is not always the answer and guidelines need to be developed. One of the issues identified in Exhibit C points out that Qwest SMEs informed AT&T that a process AT&T sought would be a change to Qwest processes. The Qwest subject matter experts ("SMEs") advised that AT&T submit a CR. The Qwest response to this CR was that the process AT&T sought was already a Qwest process and no change was needed. Had the Qwest SMEs AT&T initially spoke with been properly informed of Qwest processes, AT&T would not have had to waste time going through the CMP to find out what

Qwest's existing process is.

11. What is the status of a change when the escalation or dispute resolution is invoked? (CMP Issues Log # 226) This is the significant issue. When a CLEC objects to a Qwest change and disputes it, is the change stayed while the dispute is being resolved or is Qwest permitted to implement the change over CLEC objections while the dispute is being resolved? AT&T described this issue in its December Comments, Part IV.D, and in Exhibit H to those comments.

12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes. (CMP Issues Log # 243) Apart from the impasse issue, it appears that Qwest agrees that CLECs and Qwest must agree that a change request fits in the Regulatory Change category before it will be treated as such. The next question that must be answered is whether the Regulatory Change must be implemented as a systems change or if the regulatory mandate may be satisfied with a manual process change. From the CMP discussions held on February 5 – 7, 2002, it appeared that Qwest wanted to make the determination in its sole discretion. This is a significant problem for CLECs because it then appears that every Regulatory CR Qwest puts forward will be implemented as a systems change. However, with CLEC Regulatory CRs, Qwest wants the discretion to implement the CLEC-requested change as a manual process change. It would appear then that CLEC Regulatory systems CRs would not have the same opportunity for success that Qwest's have. CLECs seek to have Qwest identify (and document for each Regulatory Change systems CR) the criteria by which it determines whether a regulatory change should be made as a systems change or a product/process change. This issue requires a significant amount of work.

In addition to the many open issues in the CMP Issues Log, there are a host of issues identified in the CMP Gap Analysis that have not been discussed yet. These issues must also be addressed to complete the redesign of CMP.

B. Product/Process In CMP Is linked To Systems CMP Such That They Cannot Be Treated Separately for Purposes of Evaluating CMP

Identified as item A.7 above is the following open issue:

Where will a CR that impacts both an OSS interface and process be addressed – at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163)

The foregoing issue reflects the common understanding of Qwest and CLECs that there is a close relationship between systems and product/process in CMP. This relationship needs to be addressed at the outset so that the correct process is followed to address the issue. If a CR goes to the wrong process in the first instance, it will cause delay as the CLEC will need to start all over again in the correct process. Recent examples of this problem are described in Exhibit C to these comments. Exhibit C points out that at the January 16, 2002, CMP Product/Process meeting, Qwest's proposed resolutions to two CLEC product/process CRs were systems fixes. It further points out that AT&T was advised to close one of its product/process CRs and open a systems CR to address an AT&T issue. This instruction from Qwest came approximately two and one half months after AT&T submitted its product/process CR.

Because of the inextricable connection between systems and product/process in CMP, these processes cannot be separated for purposes of evaluating whether Qwest's CMP meets the FCC's requirements. CLECs and Qwest have done very little on product/process in CMP Redesign thus far. Product/process CMP Redesign must be completed before CMP can be properly evaluated.

In addition, in Exception 3094 (relating to a Qwest product/process CR) KPMG identifies problems with Qwest's handling of a product/process issue. In its Second Response dated February 12, 2002, KPMG states:

Due to differences in scope and history among ILEC change management processes, KPMG Consulting considers it inappropriate to compare Qwest CMP to that of other ILECs. As part of 271 OSS Testing effort, KPMG Consulting is evaluating Qwest CMP based on a pre-determined framework of evaluation criteria. Based on Qwest's latest response and the current state of Product/Process CMP, at least one KPMG Consulting evaluation criteria for Test 23 would be assessed "Not Satisfied." KPMG Consulting points to the CLEC request for suspension of the CR as an example of the collaborative extent of CMP and the ineffectiveness of the process to address disputes such as this. The Exception is not based on a requirement that an ILEC suspend a proposed change if the CLEC objects to the change.

KPMG Consulting considers the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹² about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

These statements make abundantly clear that Qwest product/process is deficient. So much so, that at the time of these statements Qwest would fail at least one element of the Regional Oversight Committee ("ROC") test of CMP. These statements also make clear the CMP Product/Process fit squarely within the OSS testing being conducted by the ROC.¹³

C. Third-Party Testers Have Found Significant Deficiencies In Qwest's CMP

In Arizona, Cap Gemini Telecom Media & Networks U.S., Inc. ('CGE&Y') has been testing Qwest's systems and processes, including Qwest's CMP. In 2001, CGE&Y established three Incident Work Orders relating to CMP (IWOs 1075, 1076 and 1078).¹⁴ On December 10th and 12th of 2001, CGE&Y recommended closing these IWOs, by placing reliance on the progress of the CMP Redesign process. CLECs in Arizona objected to the closing of these

¹² KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to February 2002.

IWOs and submitted impasses statements to the Arizona Commission Staff.¹⁵ AT&T continues to object to the closure of these IWOs because the CMP Redesign is not complete and because the fully redesigned CMP must be evaluated by a third party.

In the ROC process, KPMG Consulting has identified a number of Observations and Exceptions relating to CMP.¹⁶ These point to important deficiencies in the Qwest CMP and must be considered as further evidence of the noncompliance of Qwest's CMP with the FCC's requirements. KPMG continues to test (and re-test) CMP. Qwest must either address each of the concerns raised by KPMG or close them as unresolved.

In addition to each IWO, Observation and Exception that is attached, AT&T has provided a summary, attached hereto as Exhibit G. This summary groups the IWOs, Observations and Exceptions to identify, at a high level, the issues identified by the testers. These issues include the following:

1. The CMP is deficient (generally, these findings pre-date Qwest's re-design process). Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
2. Qwest fails to adhere to the practices and procedures documented in its CMP.
3. CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed.
4. The CMP does not address issues reasonably defined as CMP issues.

¹³ See ROC Qwest OSS Evaluation Project Master Test Plan, Revised Release version 5.0 (Dec. 28, 2001), ¶ 23.1.

¹⁴ Copies of these IWOs are provided at Exhibit D.

¹⁵ Attached as Exhibit E are copies of the AT&T and WorldCom impasse statements.

At the ROC TAG meeting held on February 14, 2002, there was a discussion about the testing of Qwest's CMP. The discussion centered on re-testing the CMP, resolution of the open Observations and Exceptions and whether these activities could be completed by the currently scheduled test completion date. There was no clear answer to these questions as of February 14, 2002. However, what was clear is that the Qwest CMP is still undergoing testing, that there remain many open Observations and Exceptions and that failure to resolve these issues indicates not only Qwest's failure to meet the test criteria, but also failure to meet the FCC's requirements.

D. Impasse Issues

As the Qwest Brief states, the parties to the CMP Redesign have formally identified one impasse issue at this point in the process. It is important to note that given the fact that CMP Redesign is not yet complete, other impasse issues may arise that will require resolution by the Commission. It must be clear that since there are so many issues that have not even been discussed, there is no way of knowing today what other impasse issues may arise.

The specific impasse issue identified in the Qwest Brief is stated as follows: "whether OBF language that treats changes to meet performance measurements as regulatory changes should be included in the Qwest CMP definition of Regulatory Changes." Before getting into argument about this issue, AT&T will provide relevant background information the underlies this issue:

1. Pursuant to the Clean Draft CMP Document, Regulatory Change is described as follows: "A Regulatory Change is *mandated* by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are *not voluntary* but are requisite to comply with

¹⁶ Copies of the KPMG Observations and Exceptions on CMP are attached at Exhibit F.

newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may initiate the change request.” (Emphasis added.)

2. The Qwest resource pool for completing systems changes is limited. This necessarily means that some systems changes requested in a CR do not get included in the next OSS release and, in some cases, may never be included in a release due to limited resources. A Regulatory Change has a preferred status with respect to other CRs in CMP. Regulatory Change CRs will be done first and other CRs are given secondary consideration, meaning that they only get done if prioritized high enough by the CMP body *and* Qwest has sufficient resources to complete them.

3. In the regulatory proceedings dealing with the Qwest Performance Assurance Plan (“QPAP”), Qwest has repeatedly stated that the QPAP is voluntary and that the state commissions do not have authority to impose the QPAP on Qwest.¹⁷

4. Another way to state the issue is as follows: Whenever Qwest is paying, or expects to pay, monetary penalties because it fails to meet the requirements of one or more PIDs under an effective PAP, Qwest wishes to treat all systems changes that would relieve Qwest of the payment obligation as Regulatory Changes.

First, given the definition of Regulatory Change currently set forth above, for a CR to qualify as a Regulatory Change, the change must be “mandated” and “not voluntary.” Given the

¹⁷ See *Brief of Qwest Corporation in Support of its Performance Assurance Plan (PAP)*, Multistate Proceeding (Public Version), dated September 13, 2002, at 88 (“In short, PAPs are voluntary arrangements, required by neither section 271 nor section 251, offered by a BOC wishing to enter the interLATA market whereby the BOC agrees, in exchange for section 271 approval, to bind itself to a PAP”); *Qwest Corporation’s Comments on the Recommendation of the Special Master and Recommended Performance Assurance Plan*, CO PUC, Docket No. 011-041T, dated July 10, 2001, at 19 (“The CPAP is a voluntary commitment by Qwest to demonstrate that it will maintain high wholesale performance standards after long distance entry. The CPAP is not required under any federal or state law, and the standards adopted in the CPAP often far exceed any obligation that Qwest *does* bear

fact that Qwest has advocated in its QPAP proceedings that the QPAP is voluntary and that state commissions do not have the authority to impose the QPAP on Qwest, it would be “contradictory and unfair”¹⁸ to now suggest that activities under the QPAP (paying penalties) are mandatory and not voluntary for purposes of CMP. The fact is, Qwest is agreeing to enter into the QPAP as a matter of contract. The QPAP will be part of a CLEC’s interconnection agreement. By entering into the QPAP as a matter of contract, Qwest is agreeing to make the payments called for under the QPAP. For purposes of CMP, changes to help Qwest meet its performance measurements are not Regulatory Changes.

Second, if the language Qwest desires were added to the definition of Regulatory Change in the Redlined Draft CMP Document, that language would not change the requirement that a Regulatory Change must be mandated and not voluntary. The Qwest-desired language uses the word “may,” not “must” or “shall.”¹⁹ Thus, even the Qwest-proposed language does not support Qwest’s desire to automatically treat systems changes to meet performance measurements as Regulatory Changes. By using the word “may,” it is optional to treat a change to meet performance measurements as a Regulatory Change and requires a decision to do. The important question then is who makes this decision. It is clear that Qwest would like to make this decision unilaterally. AT&T will not agree to that. This must be a decision for the CMP body to make by consensus. On the subject of Regulatory Changes generally, the Qwest Brief acknowledges that “[t]he parties have also agreed that a change will only be treated as a Regulatory Change if the

under federal or state law”); *Qwest Corporation’s Conditional Submission of its Performance Assurance Plan and Reservation of Rights*, MN PUC, Docket No. P-421/AM-01-1376, dated November 5, 2001.

¹⁸ To use Qwest’s words. Qwest states that “It would be *contradictory and unfair* to deny Qwest the ability to treat performance measurement changes as Regulatory Changes on the one hand, yet require Qwest to pay penalties for failing to meet performance measurements on the other.” Qwest Brief, at 13. The foregoing is neither contradictory nor unfair, because Qwest agrees to make these payments voluntarily.

¹⁹ Qwest seeks to add the following language to the definition of Regulatory Change: “These [changes] *may* include new functionality, enhancements to existing interface functionality, and/or enhancements required to meet performance measurements.” Qwest Brief, at 13 (emphasis added).

parties agree that a change is required to bring Qwest into compliance with a mandate.”²⁰ This same standard should be applied when Qwest seeks to make changes to help Qwest meet performance measurements. AT&T will not agree that such changes are Regulatory Changes merely by virtue of being part of a Qwest PAP. There must be an independent mandate by a court or commission requiring that Qwest make a systems change to meet its performance measurements, in order for such a change to be treated as a Regulatory Change.

Third, consider the potential impact of giving Qwest its way on this issue. If Qwest’s performance is such that Qwest has to make payments on a number of different PIDs, it is possible that every OSS release will be occupied with Qwest systems CRs to improve Qwest’s performance under performance measurements, with the *sole objective* of reducing Qwest’s payment obligations under the QPAPs. This is possible, because Qwest devotes limited IT resources to each systems release. CLECs do not know how Qwest determines the IT resources available for a systems release, and CLECs have no influence over this determination. Qwest is in complete control of this. One might also conclude that as Qwest continues to cut costs and employees from its business, this resource pool will only get smaller. In addition, Qwest cannot demonstrate that all, or that any, of these changes will actually provide improved performance to CLECs. These changes are only calculated to reduce Qwest’s payment obligations. This would be an inexcusable abuse of CMP.

Finally, AT&T strongly disagrees with Qwest’s statement that the outcome of this issue does not alter the fact of whether Qwest’s CMP meets the FCC’s standards for change management.²¹ If Qwest’s CRs relating to performance measurements are treated as Regulatory

²⁰ Qwest Brief, at 6.

²¹ Qwest Brief, at 14.

Changes pursuant to Qwest's request, ahead of all other systems CRs, it will gut the systems process in CMP and reduce its effectiveness to CLECs.

E. Qwest's CMP Is Not Reflected In A Single Document and Remains Unclear

As stated above, Qwest filed the Clean Draft CMP Document with the Qwest Brief. Qwest failed to file the Redlined Draft CMP Document. In addition, Qwest has now posted the Clean Draft CMP Document on the CMP website for the public to use.²² The Commission should be aware that Qwest informed CLECs on February 7, 2002, at the CMP Redesign meeting that Qwest would post a clean copy of the Draft CMP Document on Qwest's CMP website.²³ CLECs objected because of their concern that it would be confusing and misleading to remove all of the marked changes and CLEC comments included within the text of the Redlined CMP Document. Nonetheless, Qwest proceeded. Qwest seems to believe that by posting the document on the Qwest website, Qwest will be in a position to demonstrate that the CMP is reflected in a single document that is "clearly organized and readily accessible to CLECs."²⁴ However, posting a clean copy of this draft document does not achieve this purpose because the entire process is not reflected in this document, and the degree to which Qwest has implemented the new processes remains unclear.

Qwest has repeatedly stated in CMP Redesign meetings that if a process is not addressed in the Redlined Draft CMP Document, then Qwest simply relies on the old CMP process. In addition, if Qwest has not fully implemented a new process that is agreed upon in the Redlined Draft CMP Document, then Qwest will perform what Qwest personnel know to perform (also the

²² Qwest Brief, at footnote 3.

²³ Qwest representatives started the discussion as if they wanted CLEC input on the idea of posting a clean version of the Redlined Draft CMP Document on Qwest's website. When CLECs raised some concerns, the Qwest representatives made clear they did not really want to discuss it and intended to post the clean document without further review or comment by CLECs.

²⁴ Qwest Brief, at 15.

old process). The fact that CMP is in Redesign and is a moving target makes it very difficult for Qwest to pin this down. A good example is prioritization. Qwest's Brief states that "Qwest has implemented the process for CLECs to prioritize Qwest-originated CRs, as well as CLEC-originated CRs."²⁵ Prioritization of Qwest-originated CRs did not exist in the old process. In addition, the Redlined (and Clean) Draft CMP Document does not reflect the prioritization process being discussed by CLECs in CMP Redesign. That process is in a separate draft document the parties continue to work on in CMP Redesign. So which prioritization process is Qwest following? The one posted on the CMP website that is not part of the CMP Redesign discussions or the one that the CLECs and Qwest continue to work on, but is not available on the CMP website? As with so many statements in the Qwest Brief, just because Qwest makes a conclusory statement does not make that statement true.

In the Qwest Brief, Qwest states that it has quickly implemented the agreements reached in the CMP Redesign.²⁶ Qwest filed Exhibit B to the Qwest Brief in support of this assertion. AT&T and other CLECs have seen Qwest's Exhibit B and raised many questions about it, because it does not ring true based on the experience of the CLECs. Because of the concerns raised by CLECs, Qwest took an action item at the January 22, 2002, CMP Redesign that states: "Judy Schultz to add clarity to improvements matrix presented to the Re-Design team on 1-22."²⁷ The date on Qwest's Exhibit B is December 13, 2001, so it is apparent that Qwest has made no effort to clarify this document. It remains confusing and misleading. CLECs asked for a dialogue on this document, perhaps even joint preparation, so that it would be a reflection of a common understanding between Qwest and CLECs. Because this has not happened, the Commission should not place reliance on this document.

²⁵ Qwest Brief, at 5.

²⁶ Qwest Brief, at 18.

The foregoing discussion points to one of the reasons it is important to have third-party testing of Qwest's CMP. Throughout the Qwest Brief, Qwest makes assertions of compliance with CMP without providing evidence. Moreover, these assertions are refuted by the Observations and Exceptions brought by KPMG. For example:

1. Exception 2003 states: "Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases."
2. Observation 3066 states: "Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access (IMA) interface."
3. Exception 3111 states: "Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package."
4. Observation 3094 states: "Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties."
5. Exception 3102 states: "Qwest's internal OSS interface change management documentation is inconsistent and unclear."

²⁷ See CMP Issues Log, item 231.

6. Exception 3110 states: "Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System."

The third-party testers are able to see activities within Qwest. This is something CLECs are not able to do. The third-party testers must be allowed to review not only the language of the Redlined Draft CMP Document, but they must also evaluate Qwest's implementation and performance of the Redesigned CMP, including whether Qwest's internal documentation is consistent with the redesigned CMP. As noted above, KPMG has already identified problems in all these areas.

F. CMP Must Have A Process That Deals With PIDs

As stated above in part A.6 of these comments, because there is such a close relationship between CRs in CMP and the PIDs, there must be a process in CMP that permits meaningful dialog when, for example, Qwest rejects a CLEC CR because of the existence of PIDs. In addition to the CMP Issues Log, CLECs have identified this issue in the CMP Gap Analysis. Covad, Eschelon and AT&T each identified this issue in Items 13 through 15 of the CMP Gap Analysis, as follows:

How are CRs, which are either directly or indirectly related to PAP/PIDs, dealt with as part of CMP? What is the interrelationship between the CPAP's reference to CLEC-affecting changes and the definition of CLEC affecting that is in the process of being developed in CMP Redesign? (# 13)

PID interpretation, measurement, and changes and Qwest use of PID information in CR Responses: Whether/how dealt with in CMP. (Refer to discussion in December CMP meetings.) (# 14)

... If this is Qwest's proposal, it does not address the concern raised by AT&T and other CLECs in CMP Redesign that PID change management needs to be done in an

industry process and CMP is the most appropriate place to do it (after ROC) because of the connection all of the activities in CMP have to the PIDs (Qwest rejects CRs based on PIDs; Qwest wants to call CRs relating to PIDs regulatory changes). This remains a gap in the Redesign. (# 15)

A related activity is the notice sent out by MTG to members of the ROC TAG on January 28, 2002.²⁸ In the notice, MTG requested that participants in the ROC TAG answer a number of questions regarding PID administration after the ROC OSS test. From the questions, there is a recognition that PID administration is necessary after OSS testing is concluded. AT&T provided comments on February 11, 2002, which are attached hereto as Exhibit I. Following is an excerpt from AT&T's comments proposing industry collaboration on PID administration post OSS testing, including coordination with CMP and QPAPs:

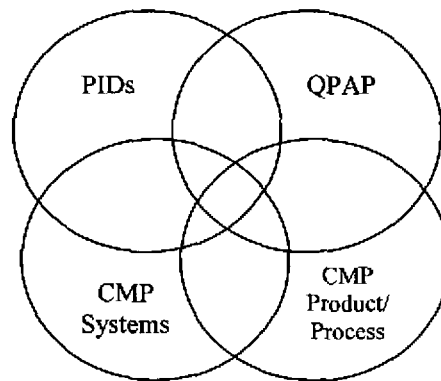
Since the creation of the ROC OSS TAG, Steering Committee and Executive Committee, other multi-state, industry-wide groups have been created. The Change Management Process exists and contains two essential elements. The first element is for the administration of changes to Qwest's OSS. The second element is for changes to Qwest's products and processes. In addition to the two CMP elements, QPAP issues point towards a multi-state, industry-wide approach to periodic plan reviews, periodic audits of the performance measurement systems and modifications to either the QPAP or the PIDs. For example, it would be an inefficient use of time and resources to have fourteen individual audits of the same Qwest performance measurement systems and processes.

While the groups and mechanisms for the administration of PIDs, CMP Systems and CMP Process and Product have been separately developed, it has become increasingly clear that there is much overlap between the functions. Change requests submitted by CLECs in the CMP Process and Product forum have been denied because Qwest considered the request a PID-related issue. Changes in Qwest's processes or new Qwest processes developed through the CMP Process and Product forum have created a need for new or modified PIDs to measure the performance of the new or modified process.

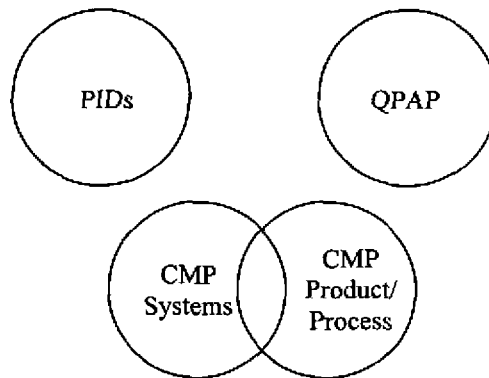
In addition to the overlap between PIDs, and the CMP Systems and CMP Process and Product elements, the still developing PAPs are adding to the overlap. For example, Qwest has submitted change requests in the CMP Systems forum to address its potential payment liabilities under the Colorado PAP. Also, since the various QPAPs rely upon the PIDs, there should be no question that the QPAPs, in whatever form, will overlap with PID administration.

²⁸ Exhibit H is a copy of the e-mail sent on January 28, 2002, by Denise Anderson of MTG with a request for comments on how to handle PID administration post ROC OSS testing.

AT&T views the natural interrelationship between the four functions as follows:



While AT&T believes the above diagram represents the nature of the interrelationships, the reality to date has been more like the below diagram:



It has been AT&T's experience that important issues that are partly PID-related and partly CMP Process and Product-related have been lost in the cracks between the CMP and the ROC OSS TAG. When raised in the CMP Process and Product forum Qwest has deemed the issue PID-related that is outside the scope of that forum. When raised in the ROC TAG, Qwest has argued that the issue is not appropriate for discussion because it impacts upon Qwest's products or processes. AT&T is concerned that if the natural interrelationships are permitted to continue to be ignored, Qwest can use the gaps between the forums to delay issues important to the CLECs from being addressed or to keep the issues from being addressed altogether.

While the Request for Comments is limited to long term PID administration, AT&T believes one of the more important goals in the development of the Post-271 administrative environment is to ensure that there is a means to keep issues from falling into the cracks between the various forums. AT&T is not proposing one super-group to cover PIDs, PAP, and CMP systems, product and processes changes. However, any model that is developed must recognize and accommodate the need for joint discussion across one or more of these groups. For example, one desired change may impact upon

Qwest systems, PIDs, and the PAP. The model should permit joint discussions on the impact of the change between the CMP elements and the PID and PAP administration groups. AT&T realizes that Arizona is not part of the ROC process; however, the issue of the interrelationship between CMP and PIDs is overarching and affects CMP and PIDs in all Qwest states. This significant gap must be addressed before Qwest's CMP should be considered compliant with the FCC's requirements. Arizona should consider either involvement with the ROC on PID administration post OSS testing, to benefit from the discussions that have already commenced, or commence such discussion in Arizona to include the interrelationship between PIDs and CMP.

G. Stand Alone Test Environment (SATE)

On January 28, 2002, AT&T filed the AT&T Comments on SATE Summary Evaluation Report, Version 3.0, ("AT&T SATE Comments") in Arizona. These comments concur in many of the detailed comments of Hewlett-Packard ("HP"), the SATE evaluator engaged by the Arizona Commission, as to the many deficiencies of SATE, although AT&T disagrees with HP's conclusions. AT&T will not repeat its comments here, but incorporates them by reference in support of AT&T's position that Qwest's SATE is not compliant with the FCC's requirement that BOCs provide a stable testing environment that mirrors production.

Since the AT&T SATE Comments were filed, there have been additional activities relating to SATE that AT&T believes are important to report here to the Commission. These activities occurred on a conference call between Qwest and HP on February 12, 2002, and another conference call between Qwest, HP, CLECs and the Arizona Commission Staff on February 14, 2002. AT&T wants to ensure that the following points are considered:

1. There remain open issues with the SATE performance measurement, PO-19.

These issues include the appropriate performance standard benchmark: Qwest believes it should be 95%, while CLECs believe it should be 98%. Failure rates of 5% are excessive and unacceptable for a test system upon which CLECs will place reliance in conducting

business with Qwest. Related to this issue is the extent to which the ongoing testing of SATE is performed by Qwest. HP has been testing SATE with a test deck of approximately 250 tests. AT&T supports this testing level as it includes varieties of test conditions, products and services that CLECs would be using in the market. It is AT&T's understanding that Qwest plans for the test deck to contain many fewer tests, on the order of 35 or 40. Qwest should not be allowed to determine the test deck, because of the risk that Qwest will exercise those areas where it knows it will pass. In addition, a more substantial test deck will produce more representative results for the ongoing evaluation of SATE which is to be reported in PO-19.

2. Notwithstanding the disagreement over the appropriate benchmark for PO-19, Qwest failed the lower 95% benchmark it advocates. The results of the HP testing indicated only 93% of the test transactions were successful on the basis of the SATE 9.04 data definition. Thus, SATE fails on at least two counts: (i) it does not meet either benchmark threshold proposed by the parties for PO-19 and (ii) since it fails the benchmark, SATE fails to meet the requirement that it be available at least thirty days prior to the availability of the production release.²⁹

3. Qwest intends to release SATE data definition 9.04a prior to February 25, 2001 (IMA 9.0 production release date), so that HP can re-test SATE prior to the release of the production environment. Qwest intends to correct in SATE 9.04a definition some of the problems identified through HP's testing of SATE 9.04. While the outcome of the test

²⁹ SATE 9.0 was released on January 1, 2002, but Qwest promptly followed with three additional point releases to address problems of which Qwest was aware. The SATE release that was used for testing (9.04) was provided on February 4, 2002. The production release of IMA 9.0 will be available on February 25, 2002; so effectively, SATE was released only 21 days before production, not thirty days as required.

may be instructive, the requirement that SATE be available thirty days prior to the production release date will still not be met.

4. Other remaining open issues with SATE include (i) whether there will be comprehensive testing of VICKI (the post order processor) and (ii) whether there will be any testing of Flow Through (another module of the test environment that is supposed to permit testing of flow through). These issues are before the Arizona Commission for resolution.

In addition, there remain open two Exceptions and one Observation relating to SATE that were issued by KMPG.³⁰ These observations indicate that SATE does not offer CLECs: (i) sufficient troubleshooting capabilities; (ii) testing capabilities for all Qwest products offered in production; and (iii) sufficient testing capabilities.

For all of the foregoing reasons, SATE currently is not an effective test environment for CLECs to use and it does not meet the FCC's requirements.

H. Qwest's Reliance On Its SGAT As Part of The Qwest Section 271 Obligations Fails If Qwest Has Not Completed The CMP Redesign For Both Systems And Product/Process

1. Simply Modifying its SGAT During § 271 Workshops to Make it Compliant with the Law Does Not In-And-Of-Itself Prove that Qwest is Complying with Its SGAT as Modified. Rather, the Commission Must Examine the Underlying Documents Qwest's Personnel Actually Use to Implement the SGAT; These Underlying Documents are Currently Under Review in the CMP Process as Requested by Qwest. Thus, the Commission Should Hold any Rulings of Compliance in Abeyance Until the CMP Process has Run its Course with Respect to These Documents.

To be in compliance with section 271 the FCC has declared that an RBOC, such as Qwest, must "support its application with *actual evidence* demonstrating its *present*

³⁰ Copies of the SATE Observations and Exceptions are attached at Exhibit J.

compliance with the statutory conditions for entry.”³¹ That is, Qwest must show that “it has ‘fully implemented the competitive checklist [item]...’”³² Thus, Qwest must plead, with appropriate supporting evidence, the facts necessary to demonstrate it has complied with the particular requirements of the checklist item under consideration.³³

For many, if not most of the revisions required to bring Qwest’s Statement of Generally Available Terms and Conditions (“SGAT”) into compliance with its obligations under sections 251, 252 and, hence section 271 there exist no PID measurements and no actual evidence demonstrating present compliance. In fact, much of the evidence of what Qwest actually does lies in its technical publications and its PCAT.³⁴ AT&T and others pointed out during the workshops that Qwest’s SGAT was not consistent with its underlying documentation. Qwest’s response was that such documentation along with agreements reached through the workshop process would be fully addressed and implemented through the CMP process, and it further acknowledged that any Commission order recommending that Qwest met a checklist item should be conditioned on Qwest’s compliance with this commitment.³⁵

At a minimum the Commission should confirm for itself that Qwest has kept the commitment it made in relation to these document updates and it should further determine whether the CMP dispute resolution process is sufficiently set-up to address disputes that may arise between the parties and Qwest when they cannot agree that Qwest

³¹ *In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State New York*, Memorandum Opinion and Order, CC Docket No. 99-295, FCC 99-404 (Rel. Dec. 22, 1999), ¶ 37 (“FCC 271 BANY Order”).

³² FCC 271 BANY Order, ¶ 44.

³³ *Id.* at ¶ 49.

³⁴ The PCAT (Product Catalog) was formerly known and discussed during many workshops as the IRRG.

³⁵ AZ Exhibit 4 Qwest 12; *see also*, CO Exhibit 4 Qwest 97, attached hereto as Exhibit K.

has actually modified its technical publications and PCAT to conform to the SGAT.³⁶

Merely inserting a provision into the SGAT that states it will govern over any conflicting documents, as SGAT § 2 does, does not fully address the issue because the FCC is looking to the Commission to make a determination based upon evidence that Qwest is in actual present compliance, not on some promised future compliance. More to the point, field personnel from either the CLEC or Qwest do not refer to the 300+ page SGAT when executing their jobs; rather, they rely on the PCAT and the technical publications. If these documents are inconsistent with the SGAT, Qwest's present actual conduct based upon such documents is as well. As a result, no finding of compliance is possible based upon such evidence.

Product documentation, such as technical publications and PCATs, would go through the product/process side of CMP. The fact that redesign of this portion of CMP has barely started raises some question about Qwest's ability to support the SGAT with such underlying documents.

2. Like the Documents that Underlie the SGAT and Instruct Field Personnel, Qwest Also Demanded that Certain Substantive Issues be Deferred to CMP for Resolution. Here Again, To Make a Finding of Compliance, the Commission Should Confirm Resolution of all Deferred Issues or Implement a Process for their Resolution.

Throughout the workshops, Qwest has deferred substantive issues to the CMP process for resolution and consideration.³⁷ Nowhere has Qwest to date brought those

³⁶ Qwest acknowledged that during the workshop process no "explicit" dispute resolution process was set up to hand the conflict between parties in relation to the PCAT and technical publications or any other issue in CMP. 3/27/01 Vol. I Multi-State Trans. at p. 86. It further acknowledged that dispute resolution would be addressed during the General Terms workshop. *Id.*

³⁷ 1/25/01 CO Trans. at 23-24 (LIS trunk intervals); 8/22/01 CO Trans. at 323-329 (LIS trunk intervals); 5/17/01 AZ Trans. at 1872-1873 (proper reasons for rejecting order); 6/27/01 Multi-State Trans. at 248-252 (changes in business rules that would affect the rejection of an LSR); 6/28/01 Multi-State Trans. at p. 14 (impacts to order processing); 5/15/01 AZ Trans. at pp. 1347-1376 (process for notification of major Qwest builds); 4/10/01 AZ Trans. at 1423-1425 (test bed issues); 5/01/01 Multi-State Trans. at 36 (process for CLECs to order loop plus MUX); 5/01/01 Multi-State Trans. at 38-39 & 327-335 (changes in policy for circuit ids); to name a few.

issues back to the Commissions to demonstrate that they have actually been addressed and resolved. In fact, AT&T, among others, has been reminding the Commissions that this step was yet to be taken.

This is equally as important as the PCAT and technical publication consideration because much of this material further indicates whether or not Qwest is actually in compliance with what its SGAT suggests and whether Qwest has kept its word and addressed the issues submitted to CMP. While Qwest's desire to rush the closure of the state section 271 process is understandable, Commissions should not fall prey to such desire without coming full circle to adequately complete their own investigations.

I. Change Management Issues Identified In The General Terms And Conditions Workshop Are Still Not Closed

Running quickly through the "CM" issues for which Qwest provides status in the Qwest Brief, there appear to be twelve issues still open out of the original eighteen:

CM -1 (Clarity and accessibility of Qwest CICMP documents). The discussion in part IV.E above, describes how Qwest documentation for CMP is not in a single document, is not clear and that implementation is uncertain.

CM-2 (Definition and adequacy of Qwest's escalation and dispute resolution process). The escalation and dispute resolution processes in the Redlined Draft CMP Document are inadequate as they still permit Qwest to implement changes over the objections of CLECs, prior to escalation or dispute resolution is concluded. See Issue 226 in the CMP Issues Log: "What is the status of a change when the escalation or dispute resolution is invoked?" See Part IV.A.11 above.

CM-3 (Five categories of changes in SBC documents). Qwest states that it has already implemented four categories of change in the CMP process. The four categories would include regulatory changes, industry guideline changes, CLEC-initiated changes and Qwest-initiated changes. It is unclear what Qwest has implemented because the regulatory change category is still an open issue and prioritization of regulatory and industry guideline changes are still open issues. *See* part IV.A.12 above. There is the impasse issue dealing with Regulatory Change. *See* part IV.D above. Industry Guideline changes also continue to be discussed in CMP Redesign.

CM-7 (Qwest-generated CRs). Qwest has agreed to do CRs, but whether they get the same treatment through the process as Qwest CRs is still an open issue. *See* part IV.A.11 (Qwest implements its CRs over CLEC objections) and 12 above.

CM-8 (Proprietary CR). Issues 88 and 89 on the CMP Issues Log state: (a) Propose language for “proprietary CR” and (b) What is the process for a CLEC-originated CR deemed proprietary and a process to handle proprietary CLEC questions and comments?

While these issues remain open and have never been discussed, the Qwest Brief states that “this issue was raised because the prior process referred to proprietary CRs. It is no longer an issue because the redesigned CMP does not provide for proprietary CRs.”³⁸ Qwest clearly arrived at this conclusion on its own, because this is not an agreed disposition as between Qwest and CLECs. Qwest seems to be pushing more and more issues to CMP, even when it appears appropriate to resolve the issue with the Qwest account team or service manager. Given this push, it is possible that CLECs will need to disclose confidential or proprietary information to Qwest in a CR in order to explain the need for a requested change. If the process does not address this possibility, what is a

CLEC to do? This could stop a change request indefinitely until agreement on how to handle the information is reached. It is particularly objectionable to AT&T that in this “collaborative” effort, Qwest considers this issue closed without gaining concurrence from the CLECs (or even discussing it). It is also important to note that the CR form used in CMP has boxes to check as to whether the CR is a proprietary submission or not.³⁹ How can this form raise the question of the CR being proprietary, while Qwest in its Brief states that this is not part of CMP?

CM-10 (Whether CLECs have had input into the development of the CMP). Starting in July 2001, AT&T can say that CLECs have had input into the development of a redesigned CMP; however, that input is not completed yet and the CLECs do not yet have a redesigned process to rely upon. This issue will not be satisfied until a clear process emerges and is followed by Qwest. That time has not come yet, based on all of the arguments set forth in Part IV of these comments.

CM-13 and 16 (Scope of CMP). The Interim Draft CMP Document does reflect language on scope; however, in virtually every CMP Redesign meeting, as discussion proceeds, parties repeatedly state that the parties need to verify that an issue under discussion is covered within the scope. This is an item that will be revisited periodically through the redesign process and then clarified, to the extent necessary, at the end of the process.

CM-14 and 15 (Whether Contents of Exhibit G and H should be included in SGAT).

Exhibits G and H were the old CMP document and the old CMP escalation process,

³⁸ Qwest Brief, at 11.

³⁹ At the following link, <http://www.qwest.com/wholesale/cmp/changerequest.html>, one can find the Change Request Form used in CMP. Near the top of the form, the following question is asked: “Proprietary for Submission to Account Manager Only? Please click appropriate box.” [yes or no]

respectively. Those will not be attached. Qwest states that it will attach the redesigned CMP document as an exhibit to its SGAT. This may work, but it hinges upon what the language in Section 12.2.6 of the SGAT states and that is unresolved to this point.

CM-17 (Processes for notification of CLECs and adequacy of process). There are at least two open issues on the CMP Issues Log that deal with notification. They are numbered 145 and 156. In addition, KPMG has opened Exception 3110, which states that “Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.” The adequacy of process remains open as Qwest continues to seek to implement its changes over the objections of CLECs. On the flip side, CLEC changes *only* get implemented if Qwest agrees. These are open issues.

CM-18 (Documents described and as yet unidentified or unknown, which include the change request prioritization process and other links). The prioritization process is still open and requires work at least on the following: Regulatory Change CRs, Industry Guideline CRs, level of effort, outputs at stages of the process.

J. Qwest Has Not Demonstrated That It Has Adhered To The New CMP Process Over Time

The IWOs, Observations, Exceptions and CMP re-design raise a very critical issue that has not been addressed by Qwest. The FCC has stated that in order for Qwest to demonstrate that it is providing nondiscriminatory access to its OSS, Qwest must demonstrate that it “has developed the necessary systems and personnel to provide sufficient access to each of the

necessary OSS functions and... is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.⁴⁰

As part of this demonstration, the Commission will give substantial consideration of the existence of adequate change management process and evidence that the BOC adhered to this process over time.⁴¹

Because Qwest's re-design is a work in progress, Qwest cannot provide any evidence that it has adhered to the process over time. The FCC Common Carrier Bureau also indicated that "[t]he independent evaluation should assess the BOC's change management process and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release."⁴² The FCC requires a third-party review of one major software release after the re-design of CMP is complete.

V. CONCLUSION

Based on the foregoing and as summarized below, CMP Redesign has not progressed sufficiently to determine that Qwest has met the FCC criteria for Section 271 approval.

A. Information Relating To The Change Management Process Is Not Clearly Organized And Readily Accessible To CLECs.

Based on AT&T's comments under part IV.E above, it is clear that the CMP is not reflected in a single document. This is compounded by the difficulty in determining which part of which CMP document applies to any particular process at any point in time.

⁴⁰ FCC 271 BANY Order, ¶ 102.

⁴¹ *Id.*

B. CLECs Have Not Had Sufficient Input In The Design And Continued Operation of The Change Management Process.

This should be clear from the vast number of significant issues that remain open as identified in part IV.A above. *See also*, CMP Issues Log and CMP Gap Analysis. In addition, redesign of the Product/Process portion of CMP, which has a significant impact on how CLECs do business with Qwest, has barely started.

C. The Change Management Process Does Not Yet Define A Procedure For The Timely Resolution of Change Management Disputes.

It is not clear that the process that has been adopted will result in timely resolution of disputes. A broader issue with the resolution of disputes deals with the fact that CLECs are always placed in the position of having to escalate or dispute things that happen in CMP, because Qwest controls everything. This process cannot be considered effective if CMP is not designed in a way that allows CLECs to deny Qwest CRs so that Qwest will have to use escalation/dispute process in the same way CLECs have to use it. In addition, the escalation and dispute resolution processes do not address the situations where Qwest insists on implementing a change over CLEC objections.

D. Qwest Has Not Demonstrated A Pattern of Compliance With Its Change Management Procedures.

Qwest states in the Qwest Brief that "Qwest has demonstrated a pattern of compliance with its change management procedures,"⁴² but Qwest presents no evidence to support this assertion. Given all of the problems identified by third-party testers, as outlined in Part IV.C above and Exhibit G, it is clear that Qwest is far from compliant with its Change Management

⁴² Letter dated September 27, 1999, from Lawrence E. Strickling, Chief, Common Carrier Bureau, to Ms. Nancy E. Lubamersky, U S West.

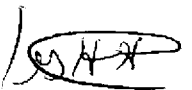
⁴³ Qwest Brief, at 18.

Procedures. Such compliance must be determined by third-party testers and cannot be completed until Qwest has fully implemented a fully redesigned CMP. It is difficult to understand how Qwest, in good faith, could assert unqualified compliance when it is aware of the outstanding CMP test issues and choose to completely omit these issues from the Qwest Brief.

E. Qwest Does Not Yet Make Available A Stable Testing Environment that Mirrors Production.

In part IV.G above, AT&T has demonstrated that Qwest does not yet provide a stable stand-alone test environment that mirrors the production environment. KPMG Observations and Exceptions also highlight the deficiencies of SATE.

**AT&T COMMUNICATIONS OF THE
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EXHIBIT A

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

CHANGE MANAGEMENT PROCESS (CMP)
FOR LOCAL SERVICES ORDERING AND PROVISIONING

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CHANGE MANAGEMENT PROCESS (CMP)
FOR LOCAL SERVICE ORDERING AND PROVISIONING
INTRODUCTION [Need to re-address at a later date]

Action Item #17

The Change Management Process (CMP) is the a formal method used by customersCompetitive Local Exchange Carriers (CLECs) and Qwest and a local service providers to initiate, communicate, prioritize, schedule, testcommunicate about and implement changes enhancements changes to Qwestprovider Operational Support Systems (OSS) interfaces which directly or indirectly impact a CLEC. used in connection with resold services and unbundled network elements. Changes include new functionality, enhancements to existing functionality, defect maintenance and introduction/retirement of interfaces, based on Local Service Ordering Guidelines (LSOG).

The change management process creates a framework for meetings in which changes to the provider's Qwest's OSSs and their business rules may be introduced or discussed. The CLECscustomer's Point Of Contact (POC) may request interface changes for future consideration by submitting a Change Request Form to the provider'sQwest's POC.

The FCC requires Incumbent Local Exchange Carriers to have processes for management of manual and electronic interfaces relative to order, pre-order, account maintenance, testing and billing. The scope of this document is to define only the processes for change management of manual and electronic interfaces relative to order and pre-order functions.

1.0 INTRODUCTION AND SCOPE

[need to readdress at a later date]

Action Item 17

This document defines the processes for change management of-essOSS interfaces, products and processes (including manual) as described below. CMPmp provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by elecCLECs to their end users.

The empCMP is managed by elecCLEC and qwestQwest representatives each having distinct roles and responsibilities. The elecCLECs and qwestQwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes qwestQwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end usersthat are provided to CLECs.

² Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

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Qwest will track changes to ~~ess~~OSS interfaces, products and processes. The ~~emp~~CMP includes the identification of changes and encompasses, as applicable, ~~[requirement definition, design, development, notification, testing, implementation and disposition of changes – revisit list]~~. Qwest will process any such changes in accordance with the ~~emp~~CMP described in this document.

~~manual and electronic interfaces relative to pre-order, and pre-order, provisioning, maintenance/repair, and billing functions. Interface impact is defined as changes to field content or format, or changes in the business rules used to govern field population. This includes national guideline changes, e.g., LSOG, as well as providerQwest specific interface process and system changes. Changes include new functionality, enhancements to existing functionality, introduction/retirement of interfacesprocesses and systems and maintenance activities affecting production defects. Desired changes should be submitted to the appropriate ATIS Forum.~~

~~Theis scope includes any pre-order, order business rules, interface system testing and maintenance that impact ongoing and future technical and operational processes, and changes that alter the relationship in the manner in which the provider Qwest and customer a CLEC do business.~~

~~The CMP provides a means for changes to the provider's OSSs and their business rules. The customer's Point Of Contact (POC) may request interface changes for future consideration by submitting a Change Request Form to the provider's POC. These requests may include new functionality or changes to existing functionality.~~

~~The types of changes that will be handled by this process are:~~

- ~~☐ Software changes~~
- ~~☐ System Environment Configuration changes~~
- ~~☐ Changes resulting from new or changed Industry Guidelines / Standards~~
- ~~☐ Product and Services (e.g., new services available via the in-scope interfaces)~~
- ~~☐ Processes (e.g., electronic interfaces and manual processes relative to order and pre-order)~~
- ~~☐ Regulatory~~
- ~~☐ Documentation (e.g., business rules for electronic and manual processes relative to order and pre-order.~~
- ~~☐ Defect resolution~~
- ~~☐ Guidelines for provider-specific change management processes~~

~~The providerQwest will track changes to the OSS interfaces as change requests and assign a tracking number to each change request. The CMP begins with the identification of the change request and encompasses requirement definition, design, development, notification, testing, implementation and decommissioning of the change request.~~

~~The CMP is managed by customerCLEC and provider representatives each having distinct roles and responsibilities. The customerCLEC and the providerQwest will hold regular meetings to exchange information about the status of existing change requests, the need for new changes,~~

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what changes the provider Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

The CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings and is based on group consensus. The parties agree to act in Good Faith in exercising their rights and performing their obligations pursuant to this CMP. This document may be revised, through the procedures set forth by the procedures described in Section (X), the OBF, as business and/or regulatory conditions dictate.

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Managed Changes

Changes to Existing Interfaces

2.0 TYPES OF CHANGE

AThe Cchange Rrequest should fall into one of the following classifications:

I.Type 1 (Production Support) Change

~~A Type 1 change corrects problems discovered in production versions of an OSS application interface. Either the providerQwest or the customerCLEC may initiate the change request. Typically, this type of change reflects instances where a technical implementation is faulty or inaccurate such as to cause correctly or properly formatted data to be rejected. Instances where providersQwest or customerCLECs misinterpret interface specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified business process are identified and resolved during the change management review of the change request. Type 1 changes will be processed on an expedited basis by means of an emergency release of software/documentation.~~

~~Additionally, once a Type 1 change is identified, the change management team (see the Managing The Change Management Process section) must determine the nature and scope of the maintenance. Type 1 changes are categorized in the following manner:~~

~~**Severity 1:** Production Stopped: Interface Unusable – Interface discrepancy results in totally unusable interface requiring emergency action. CustomerCLEC Orders/Pre-Orders cannot be submitted or will not be accepted by the providerQwest and manual work-arounds are not feasible. Correction is considered essential to continued operation. The providerQwest and customerCLECs should dedicate resources to expedite resolution.~~

~~Acknowledgment Notification — = 1 hour~~

~~Status Notification — = bi-hourly~~

~~**Severity 2:** Production Degraded: Interface Affecting – An interface discrepancy that requires a work-around(s) on the part of the customerCLEC or the providerQwest. The change is considered critical to continued operation. It does not stop production, but affects key applications.~~

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Acknowledgment Notification = 4 hours

Status Notification = weekly

Implementation time = 14 – 30 calendar days

Severity 3: ~~Process Impacted: Pre-order / Order requests can be submitted and will be accepted through normal processes / interfaces. Clarification is considered necessary to ongoing operations.~~

Acknowledgment Notification = 7 calendar days

Implementation time = 30 – 60 calendar days

II.Type 2 (Regulatory) Change

2.1 Regulatory Change

A ~~Regulatory~~Type 2 Cchange is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the ~~customer~~CLEC or the ~~provider~~Qwest may initiate the change request.

III.2.2 Type 3 (Industry Guideline) Change

A ~~Type 3 change implements telecommunications~~An Industry G~~guideline Change implements Industry Guidelines using a national implementation timeline, if any.~~ Either the ~~provider~~Qwest or the ~~customer~~CLEC may initiate the change request. These guidelines are industry defined by:

- Alliance for Telecommunications Industry Solutions (ATIS) Sponsored
- Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interface Committee (EDI)
- American National Standards Institute (ANSI)

IV.2.3 Type 4 (Provider Originated) Change Qwest Originated Change

A ~~Type 4 A Qwest Originated change is originated by the provider~~Qwest does not fall within the changes listed above and is within the scope of CMP and affects interfaces between customers

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and the provider. These changes may involve system enhancements, manual and/or business processes].

V.2.4 Type 5 (Customer CLEC Originated) Change CLEC Originated Change

A Type 5-A CLEC Originated change is originated by the customer CLEC does not fall within the changes listed above and is within the scope of CMP and affects interfaces between customers and the provider. These changes may reflect a business process improvement that the customer CLEC is seeking to implement and implies a change in the way in which the customer CLEC wishes to interact with the provider Qwest.

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VI. Tracking Change Requests [move to CR initiation process]

The provider Qwest will assign a tracking number to each change request and track changes to each change request. Tracking will be accomplished via a change request log.

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3.0 CHANGE REQUEST INITIATION PROCESS

3.1 CLEC-Qwest OSS Interface Change Request Initiation Process – Revised 11-01-01

The change request initiator will complete a Change Request Form (see Appendix X) as defined by the instructions on Qwest's CMP web site. The Change Request Form is also located on Qwest's CMP web site.

(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT THE CMP REDESIGN TEAM HAS PROPOSED CHANGES TO THE CHANGE REQUEST FORM THAT WOULD CLARIFY THE CHANGE THAT IS BEING REQUESTED AND PROVIDE MORE GUIDANCE FOR QWEST TO ASSESS ABILITY TO SUPPORT AND LEVEL OF EFFORT. WCOM COMMENTS: WE NEED TO HAVE PARITY LANGUAGE FOR CHANGES MADE TO ALL INTERFACES AT THE SAME TIME INSERTED THROUGH OUT THIS DOCUMENT.)

A CLEC or Qwest may request (AT&T Comment) seeking to a change to an existing OSS interface, (AT&T Comment) to establish a new OSS interface, or (AT&T Comment) to the retirement of an existing OSS interface must submit a change request (CR). **(WCOM COMMENT: WCOM BELIEVES THE TYPES OF CHANGES THAT CAN BE REQUESTED BY EITHER PARTY NEED TO BE SPECIFIED HERE. THE CMP REDESIGN TEAM AGREED THAT THE FOLLOWING CHANGE REQUEST TYPES CAN BE REQUESTED BY EITHER PARTY:**

TYPE 2 (REGULATORY), TYPE 3 (INDUSTRY GUIDELINE), AND DEPENDING ON THE PARTY EITHER TYPE 4 (QWEST INITIATED) OR TYPE 5 (CLEC INITIATED))

Regulatory or Industry Guideline Change Request (from 02-07-02 Redesign)

The party submitting a Regulatory or Industry Guideline CR must also include sufficient information to justify the CR being treated as a Regulatory or Industry Guideline CR in the CR description section of the CR form. Such information must include specific references to regulatory or court orders, legislation, or industry guidelines as well as dates, docket or case number, page numbers and the mandatory or recommended implementation date, if any.

Qwest or any CLEC may submit Regulatory and Industry Guideline CRs.

Not later than 8 business days prior to the Systems CMP Monthly meeting, any party objecting to the classification of such CR as Regulatory or Industry Guideline must submit a statement documenting reasons why the objecting party does not agree that the CR should be classified as Regulatory or Industry Guideline change. (Regulatory and Industry Guideline CR may not be Walk ons.)

If any party has objected to the classification of a CR as Regulatory or Industry Guideline, that CR will be discussed at the first monthly Change Management Meeting. At that meeting, the parties will attempt to reach agreement regarding the classification of the CR. If the parties at

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that meeting are unable to agree regarding the classification of the CR, the CR will be treated as a non-Regulatory, non-Industry Guideline CR and prioritized with the CLEC-initiated and Qwest-initiated CRs, unless and until the CR is declared to be Regulatory or Industry Guideline through dispute resolution.

The burden to initiate the escalation or dispute resolution processes lies with the party that believes the CR should be treated as a Regulatory or Industry Guideline CR. Qwest or any CLEC that believes its CR should be treated as a Regulatory or Industry Guideline CR despite objection to such categorization may invoke the escalation or dispute resolution process.

A CR originator-elec e-mails a completed change request (CR) form to the Qwest-sSystems CMP Manager: within two (2) business days after Qwest receives a complete CR: **(WCOM COMMENT: THE WAY THIS READS, QWEST INITIATED CRS FOLLOW THIS SAME PROCESS, IS THAT THE INTENT? WCOM BELIEVES IT SHOULD BE.)**

- Qwest's CMP Manager assigns a CR number and logs the CR into the CMP database.
- The Qwest CMP Manager- forwards the CR to the CMP Group Manager.
- The Qwest CMP Manager- sends acknowledgement of receipt to the submitteroriginator and updates the CR database.

Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the complete CR to the CMP web site.
- The CMP Group Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate director responsible for the CR.
- Tthe CRPM obtains ferrom the director the names of the assigned subject matter expert(s) (SME).
- Tthe CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
 - description of CR
 - originatoring-elec
 - assigned CRPM
 - assigned CR number
 - designated Qwest SMEs and associated director(s)

Within eight (8) business days of receipt of a complete CR, the CRPM will coordinates and holds a clarification meeting with the originatoring-elec and Qwest's SMEs. If the-originating elesoriginator is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest-will may not provide a response to a CR until a clarification meeting has been held.

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At the clarification meeting, Qwest and the originator-elec will review the submitted CR, validate the intent of the originator's-elec's CR, clarify all aspects, identify all questions to be answered, and determine deliverables to be produced. After the clarification meeting has been held, the CRPM will document and issue -meeting minutes within five (5) business days. Qwest's SME will internally identify options and potential solutions to the CR.

CRs received three (3) weeks prior to the next scheduled CMP meeting will be presented at that CMP meeting. At least one (1) week prior to that scheduled CMP meeting, the CRPM will have the response posted to the web, added to CMP database, and will notify all CLECs via email. CRs that are not submitted by the above specified cut-off date may be presented at that CMP meeting as a walk-on item with current status. Qwest may not provide responses to these walk-on requests until the next months CMP meeting. The originator-elec will present its CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. Then, participating-elec CLECs will then be given the opportunity to comment on the CR and subsequent clarifications. Clarifications and/or modifications related to the CR will be incorporated. Qwest's SME will present options and potential solutions to the CR if applicable. Consensus will be obtained from the participating elec CLECs as to the appropriate direction/solution for Qwest's SME to take in responding to the CR if applicable.

on a monthly basis, qQwest -will reviews the received-crCRs received prior to the cut off date and evaluates whether qwestQwest can implement them. qQwest's responses will be one of the following:

- "aAccepted" (qQwest will -implement the elecCLEC request) with position stated, or -if the crCR is accepted, qQwest will provide the following in its response:
 - Ddetermination and presentation of options of how the-crCR can be implemented
 - Identification of the preliminary level of effort (Ss, Mm, Ll, XLxl) required to implement the-crCR. **(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)**
 - Ssmall – requires changes to only one subsystem of a single system
 - Mmedium – requires changes to 2 or more subsystems of a single system
 - Llarge – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
 - Eextra Llarge – requires extensive redesign of at least one system.
- "dDenied" (qQwest will not implement the elecCLEC request) with basis for the denial, including reference to substantiating material. **(WCOM COMMENT: AGAIN THE WAY THIS READS, QWEST INITIATED CRS MAY BE DENIED AS WELL. THIS IS APPROPRIATE GIVEN THAT THE CMP REDESIGN TEAM AGREED THAT QWEST AND CLEC ORIGINATED CRS GO THROUGH THE SAME PROCESSES.)**

if the-cr can be implemented, qwest will evaluate the-cr and provide the following:

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determination and presentation of options of how the cr can be implemented
identification of the preliminary level of effort (s, m, l, xl) required to implement the cr

if elecCLECs do not accept qQwest's response, they may elect to escalate or dispute the crCR
in accordance with the agreed upon empCMP escalation or dispute resolution procedures. If the
originating elecCLEC does not agree with the determination to escalate or pursue the dispute
resolution, it may withdraw its participation from the crCR and any other elecCLEC may become
responsible for pursuing the crCR upon providing written notice to the qQwest empCMP
mManager. If the elecCLECs do not accept qQwest's response and do not intend to escalate
or dispute at the present time, they may request qQwest to status the crCR as deferred. The
crCR will be statused deferred and elecCLECs may activate or close the crCR at a later date.

aAt the monthly empCMP meeting, the crCR originator will provide an overview of its/their
respective crCR(s) and qQwest will present either a status or its response. - crs that qwest has
denied can be escalated in accordance with the agreed escalation procedures under emp.

qQwest or elecCLEC originated crCRs for changes to an existing ossOSS interface will then be
prioritized by the elecCLECs and qQwest resulting in the initial release candidate list.
elecCLEC or qQwest originated crCRs for introduction of a new interface or retirement of an
existing interface are not subject to prioritization and will follow the introduction or retirement
processes outlined in Sections x and x, respectively.

Based on the initial release candidate list, Qwest will begin its development cycle which includes
the following milestones:

- Business and systems requirements: -Qwest engineers define the business and functional
specifications during this phase. The specifications are completed on a per candidate basis
in priority order.
- (AT&T Comment) Packaging: Qwest and CLECs will discuss grouping candidates
with affinities may be addressed more efficiently if taken together. [AT&T comment:
this may not be exactly the right description. We just wanted to add this to this list of
steps.]
- Design: Qwest engineers define the architectural and code changes required to complete
the work associated with each candidate. The design work is completed on a per candidate
basis in priority order.
- Code & Test: Qwest engineers will perform the coding and testing required to complete the
work associated with each candidate. The code and test work is completed on a per
candidate basis in priority order.

Uusing the initial release candidate list, qQwest will begin business and system requirements.
dDuring the business and systems requirement efforts, CRs may be modified or new CRs may

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be generated (by clecCLECs or qQwest), with a request that the new or modified CRs be considered for addition to the release candidate list (late added CRs). **(WCOM COMMENTS: CHANGE "INITIAL RELEASE CANDIDATE LIST TO "RELEASE CANDIDATE LIST.)** If the cmpCMP body grants the request to consider the late added-crCRs for addition to the release candidate list, qQwest will size the-crCR's requirements work effort. If the requirements work effort, for the late added-crCRs, can be completed by the end of system requirements, the initial release candidate list and the new-crCRs will be prioritized by clecCLECs in accordance with the agreed upon-pPrioritization-pProcess **(see sSection xx)**. If the requirements work effort, for the late added-crCRs, cannot be completed by the end of system requirements, the-crCR will not be eligible for the release and will be returned to the pool of-crCRs that are available for prioritization in the next-ossOSS interface release.

~~using the initial release candidate list, qwest will begin business and system requirements. during the business and systems requirement efforts, new crs may be generated (by clec or qwest), with a request that the new crs be considered for addition to the release candidate list. if the cmp body grants the request to consider the new crs for addition to the release candidate list, the initial release candidate list and the new crs will be prioritized by clec in accordance with the agreed upon prioritization process (see section xx).~~

~~crs which are introduced during business and system requirements phase will be reviewed by qwest to size the requirements effort. if the requirements work effort cannot be completed by the end of system requirements, the-cr will not be eligible for the release and will be returned to the pool of crs that are available for prioritization in the next-oss interface release.~~

~~aAt the monthly cmpCMP meeting following the completion of the business and system requirements, qQwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. Tthe newly packaged list of-crCRs will be used as the release candidate list during the design phase of a release. aAt the monthly cmpCMP meeting following the completion of design, qQwest will commit to a final list of-crCRs for inclusion in the release. (WCOM COMMENT: PLEASE CLARIFY? IT SOUNDS LIKE QWEST CANNOT PACKAGE CRS UNTIL THE BUSINESS AND SYSTEM REQUIREMENTS PHASE IS COMPLETE WHICH IS AFTER PRIORITIZATION HAS TAKEN PLACE...THUS IT IS CONCEIVABLE THAT CRS THAT MAY HAVE BEEN CONSIDERED LOW PRIORITIZE COULD HAVE AFFINITY WITH A HIGH PRIORITY CANDIDATE AND BY ASSOCIATING THE TWO, A HIGHER PRIORITY CANDIDATE MAY NOT MAKE IT TO THE DESIGN PHASE BECAUSE OF THE PROCESS THAT WOULD BE IN PLACE WHICH LOOKS AT PRIORITY ORDER. QUESTION: IS IT POSSIBLE FOR QWEST TO PACKAGE CRS PRIOR TO THE PRIORITIZATION PHASE? IF SO, WE COULD AVOID THE ABOVE POSSIBILITY.)~~

~~lIf, in the course of the code and test effort, qQwest determines that it cannot complete the work required to include a candidate in the planned release, qQwest will **(AT&T Comment) discuss**~~

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~~advise~~ the ~~elec~~CLECs, in the next ~~cmp~~CMP meeting, ~~(AT&T Comment)~~ **either of the removal of that candidate from the list (AT&T Comment) or a delay in the release date to incorporate that candidate.** ~~If the candidate is removed from the list, Qqwest will also advise the~~ ~~elec~~CLECs as to whether or not the candidate could become a candidate for the next point release, with appropriate disclosure as part of the current major release of the ~~oss~~OSS interface. ~~Alternatively, the candidate will be returned to the pool of crCRs that are available for prioritization in the next ossOSS interface release.~~

~~w~~When Qqwest has completed development of the ~~oss~~OSS interface change, ~~q~~Qwest will release the ~~oss~~OSS interface functionality into production for use by the ~~elec~~CLECs.

~~u~~Upon implementation of the ~~oss~~OSS interface release, the ~~cr~~CRs will be presented for closure at the next ~~cmp~~CMP monthly meeting.

From Master Redline 10-03-01

~~The CLEC will submit the Change Request Form to the appropriate Qwest CMP Manager electronically as defined in the CR Form instructions. Qwest will review the submitted change request for completeness. Within two (2) business days of receipt, Qwest will either request information to ensure a complete request or will return a tracking number for the change request. This will be done via email to the originator. Within ex (x) business days after the CR Tracking number has been assigned, Qwest will contact the CR originator to schedule clarification discussions if necessary.~~

~~Qwest will provide a response notification to the CLECs within X business days via email and will be posted on the CMP web site. The CR originator may request a conference call before the next scheduled CMP Meeting to discuss the provided response~~

~~Change requests that have been assigned a tracking number fourteen (14) calendar days prior to the next prioritization meeting will be included on the spreadsheet of change requests pending initial rating.~~

~~Within twenty-one (21) calendar days after the change request is submitted, Qwest will provide a preliminary assessment indicating one of the following:~~

- ~~☐ The change request is accepted and is a candidate for prioritization (see Prioritization section).~~
- ~~☐ The change request is rejected, and the reason for rejection.~~

~~All valid change requests and the change request log will be posted on Qwest's web site.~~

~~CLECs may submit a formal request to Qwest to re-rate a change request no later than fourteen (14) calendar days prior to the next prioritization review. The request must include a reason for requesting the re-rate. This will normally be done via e-mail to Qwest with a copy to all Change Management team members.~~

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~~CLEC initiated requests are Type 5, except when the proposed change has an impact on a regulatory mandate, e.g. metrics. Change requests that have impact on regulatory mandates are Type 2.~~

~~Provider Originated Requests~~

~~Provider initiated requests are Type 4, except when the proposed change has an impact on a regulatory mandate, e.g. metrics. Change requests that have impact on regulatory mandates are Type 2.~~

~~Type 4 requests will be made available to CLECs at least fourteen (14) calendar days prior to a scheduled prioritization review. The Type 4 change requests, except those that are related to new products or services, are prioritized by CLECs with Type 5 change requests (see Prioritization section).~~

~~If Qwest announces a new interface before applicable guidelines are finalized at the appropriate industry forums, Qwest will review the final guidelines when they are issued. The review will determine any alterations that may be necessary for compliance with the finalized requirements and will work the changes within the guidelines of the CMP. Qwest will review its system requirements and provide known exceptions to industry guidelines.~~

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3.2 CLEC PRODUCT/PROCESS CHANGE REQUEST INITIATION PROCESS

If a CLEC wants Qwest to change a Product/Process the CLEC e-mails a completed Change Request (CR) Form to the Qwest Product/Process CMP Manager. Within 2 business days Qwest's Product/Process CMP Manager reviews CR for completeness, and requests additional information from the CRer originator, if necessary, within two (2) business days after Qwest receives -a complete CR:

- The Qqwest CMP manager assigns a CR Number and- logs the CR into the CMP Database.
- The Qwest CMP Manager forwards the CR to the CMP Group Manager.
- Tthe Qqwest CMPemp manager sends acknowledgment of receipt to the CR submitter and updates -the CMPemp -Database.

Wwithin two (2) business days after ACKNOWLEDGMENT,

- The Qwest CMP Manager posts the complete CR to the CMP Web site
- The CMP Group Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR.
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME).
- the CRPMcrpm will provide a copy of the detailed CR report to the CRer originator which includes the following information:
 - Description of CRer
 - originating CLECle
 - assigned CRPMcrpm
 - assigned CRer number
 - designated Qqwest SMEsmes and associated director(s)

Within eight (8) business days after receipt of a complete CRer, the CRPM Coordinates and holds a Clarification Meeting with the Originating CLEC and Qwest's SMEs. If the originating elecCLEC is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qqwest will not provide a response to a CRer until a clarification meeting has been held.

At the Clarification Meeting, Qwest and the Originating CLEC review the submitted CR, validate the intent of the Originating CLEC's CR, clarify all aspects, identify all questions to be answered,

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and determine deliverables to be produced. after the clarification meeting has been held. The CRPM will document and issue meeting minutes within five (5) business daysBUSINESS DAYS. Qwest's SME will internally identify options and potential solutions to the CR CRs received three (3) weeks prior to the next scheduled CMP meetingTHREE (3) WEEKS PRIOR TO THE NEXT SCHEDULED cmp-meETING will be presented at that-THAT- CMP Meeting. CRers that are not submitted by the above specified cut-off date may be presented at that cmpCMP meeting as a walk-on item with current status. The Originating CLEC will present its CR and provide any business reasons for the CR. Items or issues identified during the previously held Clarification Meeting will be relayed. Then, participating CLECs will be given the opportunity to comment on the CR and subsequent clarifications. Clarifications and/or modifications related to the CR will be incorporated. Qwest's SME will present options and potential solutions to the CR. consensus will be obtained from the participating CLECs as to the appropriate direction/solution for Qwest's SME to take in responding to the CR.

Subsequently, Qwest will develop a draft response based on the discussion- from the Monthly CMP Meeting.- Qwest's Responses will be:

- "Accepted" (Qwest will implement-IMPLEMENT- the CLEC request) with position stated, or
- "Denied" (Qwest will not implement the CLEC request) with basis for the denial, including reference to substantiating material.

Aat least one (1) week prior to the next scheduled cmpCMP meeting, The CRPM will have the response posted to the Web, added to CMP Database, and will notify all CLECs via email

All Qwest Responses will be presented at the next scheduled cmpCMP meeting by -Qwest, who will conduct a walk through of the response. Participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response

Based on the comments received from the Monthly Meeting, Qwest' may revise its response and issue a modified response at the next monthly CMP meeting. within ten (10) business days after the cmpCMP meeting. Qqwest will notify the-elecCLECs of Qqwest's intent to modify its response.

If the CLECs -Ddo not accept Qwest's response, any-elecCLEC can elect to escalate the CR in accordance with the agreed upon cmpCMP Escalation or dispute resolution Procedures. If the originating CLEC does not agree with the determination to escalate or pursue the disputeDISPUTE resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuingPURSUING- the CR upon providing written notice to the Qqwest cmpCMP manager.

lIf the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be statused Deferred and elecCLECs may activate or close the CR at a later date.

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The CLECs' acceptance of Qwest's response may result in:

- The response answered the CR and no further action is required;
- The response provided an implementation plan for a product or process to be developed;
- Qwest Denied the CLEC CR and no further action is required by CLEC.

If the CLECs have accepted Qwest's response, Qwest will provide notice of planned implementation in accordance with time frames defined in the CMP. If necessary, Qwest may request that CLECs provide input during the development stage. Qwest will then deploy the Qwest recommended implementation plan.

3

After Qwest's revised/new product or process is placed into production, CLECs will have no longer than 60 calendar days to evaluate the effectiveness of Qwest's revised/new product, or process, provide feedback, and indicate whether further action is required. Continual process improvement will be maintained.

Finally, the CR will be closed when CLECs determine that no further action is required for that CR.

From Master Redline 10-03-01

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INTRODUCTION OF A NEW INTERFACE

Qwest Proposed Introduction of an OSS Interface Process—Revised 11-01-01

4.0 INTRODUCTION OF A NEW OSS INTERFACE

The process for introducing a new interface will be part of the CMP. Introduction of a new OSS interface may include an application-to-application or a Graphical User Interface (GUI).

It is recognized that the planning cycle for a new interface, of any type, may be greater than the time originally allotted and that discussions between CLECs and Qwest may be held prior to the announcement of the new interface.

With a new interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

4.1.1 Introduction of a New Application-to-Application Interface Release Planning (See Appendix XX: Timeline)

At least nine (9) months in advance of the target implementation date of a new application-to-application interface, Qwest will issue a Release Announcement, post the Preliminary Interface Implementation Plan on Qwest's web site, and may host a design and development meeting. share the new interface plans via web site posting and CLEC notification.

4.1.1 Release Announcement

Where practicable, the Release Announcement and Preliminary Interface Implementation Plan will include: Qwest will share preliminary plans for the new interface, including:

- Proposed functionality of the interface including whether the interface will replace an existing interface
- Proposed detailed implementation time line (e.g., milestone dates, CLEC/provider Qwest comment cycle/response turnaround dates)
- Proposed meeting date to review the Preliminary Interface Implementation Plan
- ☐ Provider constraints
- Exceptions to industry guidelines/standards, etc. if applicable
- ☐ Proposed CLEC/provider meeting plans
- ☐ Requirements
- ☐ Design & Development
- ☐ Connectivity and Firewall Rules

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- ☐ Test Planning
- ☐ Planned Implementation Date

•

- ☐ Change Control

4.1.2 4.2 CLEC Comments/Qwest Response Cycle and Preliminary Implementation Plan Review Meeting

CLECs have fourteen (14) calendar days from the initial release announcement to provide written comments/questions on the documentation. Qwest will respond with written answers to all CLEC issues within twenty-one (21) calendar days of the Initial Release Announcement. Qwest will review these issues and its implementation schedule at the Preliminary Implementation Plan Review Meeting approximately twenty-eight (28) calendar days after the Initial Release Announcement.

4.1.3 1.32 Initial Interface Technical Specifications

Qwest will provide draft technical specifications at least one hundred twenty (120) calendar days prior to implementing the release, ~~unless the CMP Exception Process (see Section xx) has been invoked.~~ In addition, Qwest will confirm the schedule for the walk-through of technical specifications, ~~and CLEC comments, and Qwest response cycle.~~

4.1.4 1.32.1 Initial Notification Content

This notification will contain:

- Purpose
- Logistical information (including a conference line) for walk-through
- Reference to draft technical specifications, or web site
- Additional pertinent material
- CLEC Comment/Qwest Response cycle
- Draft Connectivity and Firewall Rules
- Draft Test Plan

4.1.5 1.43 Walk Through of Draft Interface Technical Specifications

Qwest will sponsor a walk through, including the appropriate internal subject matter experts (SMEs), beginning one-hundred and ten (110) calendar days prior to implementation ***(AT&T Comment) and ending one-hundred and six (106) calendar days prior to implementation.*** A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

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4.1.6 1.43.1 — Conduct Walk-through

Qwest will lead the review of technical specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items, and notify CLECs of responses 100 calendar days prior to implementation.

4.1.7 1.54 — CLEC's Comments on Draft Interface Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send a written response comments/concerns to the Systems CMP Manager no later than one-hundred and four (104) calendar days prior to implementation.

4.1.8 1.65 — QwestWEST Response to Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns and action items captured at the walk through, no later than one hundred (100) calendar days prior to implementation. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the final notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final technical specifications.

4.1.9 1.76 — Final Interface Technical Specifications

Generally, no less than one hundred (100) calendar days prior to the implementation of the new interface, Qwest will issue the Final Release Requirements to CLECs via web site posting and a CLEC notification. (WCOM COMMENT: WHY IS THE TERM "GENERALLY" INSERTED HERE? THERE SHOULD BE SPECIFIED RELEASE NOTICE DATES FOR INTERFACE TECHNICAL SPECIFICATIONS.)

Final Release Requirements will include:

Detailed requirements
Connectivity and Firewall Rules
Test Plan

- Final Notification Letter, including:

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-
- Summary of changes from Qwest response to CLEC comments on Draft Technical Specifications
- If applicable, Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Purpose
- Reference to final technical specifications, or web site
- Additional pertinent material
- Final Connectivity and Firewall Rules
- Final Test Plan (including Joint Testing Period)
- Release date

I.7 Content of Final Notification Letter

The Final Release will include the following:

Summary of changes from Qwest response to comments

Indication of type of change (e.g., documentation change, business rule change, clarification change)

Changed requirements pages from initial notice, or reference to web site for final technical specifications

Testing period

Release date

Qwest's planned implementation date will not be sooner than one hundred (100) calendar days from the date of the final release requirements, unless the exception process has been invoked. The implementation time line for the release will not begin until final specifications are provided. Production Support type Emergency changes within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

II.1.2 CLEC and Qwest Comments/Responses/Comments

Upon review of the preliminary plans for the interface if the CLEC wishes to provide feedback the CLEC must send a written response to Qwest. These responses must be provided no later than seven (7) calendar days prior to the first scheduled meeting. The CLEC's response will specify the CLEC's questions, issues and any alternative recommendations.

CLECs may provide feedback to Qwest during CLEC/provider meetings. Additional CLEC feedback may be provided in accordance with the dates outlined in the detailed implementation time line.

III. Provider Responses/Comments

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~~Qwest will maintain both a proprietary and non-proprietary issue log containing CLEC comments and Qwest responses. This non-proprietary issue log will be posted to Qwest's web site upon receipt of CLEC feedback. Qwest will respond to the CLEC feedback in accordance with the dates outlined in the detailed implementation time line. Qwest will also communicate its base line interface development plans via web site posting and CLEC notification in accordance with the dates outlined in the detailed implementation time line.~~

IV.1.4 Final Release Requirements Announcement

~~CLECs via web site posting and a carrier CLEC notification.~~

~~Qwest will provide a Final Release Announcement to the CLECs via web site posting and a carrier notification.~~

4.2 Introduction of a New GUI

~~Qwest will issue a Release Notification forty-five (45) calendar days in advance of the Release Production Date. This will include:~~

- ~~• Proposed functionality of the interface including whether the new interface will replace an existing interface.~~
- ~~• Implementation time line (e.g., milestone dates, CLEC/Qwest comment cycle, Interface overview date)~~
- ~~• Implementation date~~
- ~~• Logistics for GUI Interface Overview~~

~~At least twenty-eight (six (28)-26) calendar days in advance of the target implementation date of a new GUI interface, Qwest will issue a Release Announcement, post the Interface Overview on Qwest's web site and may host a design and development meeting. At a minimum, the Release Announcement will include:~~

~~:~~

- ~~• Draft User Guide~~

~~Proposed functionality of the interface~~

~~Implementation time line (e.g., milestone dates, CLEC/Qwest comment cycle)~~

~~Proposed CLEC/Qwest meeting to review the Interface Overview.~~

~~Initial CLEC implementation requirements (e.g., hardware, software, connectivity, firewall rules, etc.)~~

- ~~• How and When Training will be administered~~

~~Implementation date (WCOM COMMENT: WHAT ABOUT IMPLEMENTATION DATE AND INTERFACE OVERVIEW SCHEDULE?)~~

4.2.1 II.1 Interface Overview

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The Interface Overview meeting should be held no later than twenty- seven (27) calendar days prior to the Release Production Date. At the meeting, Qwest will present an overview of the new interface.

4.2.2 II.21 CLEC Comments and Qwest Response

At least twenty-five (25) ~~No more than four (4)~~ calendar days prior to the Release Production Date *[AT&T Comment: we should define this in the Master Redline. If it is already on the list as a term we need to define, that's fine.]* following the Release Announcement CLECs must forward their written comments and concerns/questions to Qwest. Qwest will consider ~~elec~~CLEC comments and may address them -- Qwest will respond to CLEC comments with the release of the Final Notification. ~~at the Interface Overview Meeting.~~

II.2 Interface Overview

The first scheduled meeting should be held no less than seven (7) calendar days following Qwest's notice issuance. At the meeting, Qwest will share an overview of the new interface, including:

Response to CLEC Comments
Proposed implementation timeline

4.2.3 II.3 Final Notification

Qwest will issue a final notice no less than twenty-one (21) ~~c~~Calendar ~~14~~ days prior to the Release Production implementation date. The final notice will include:

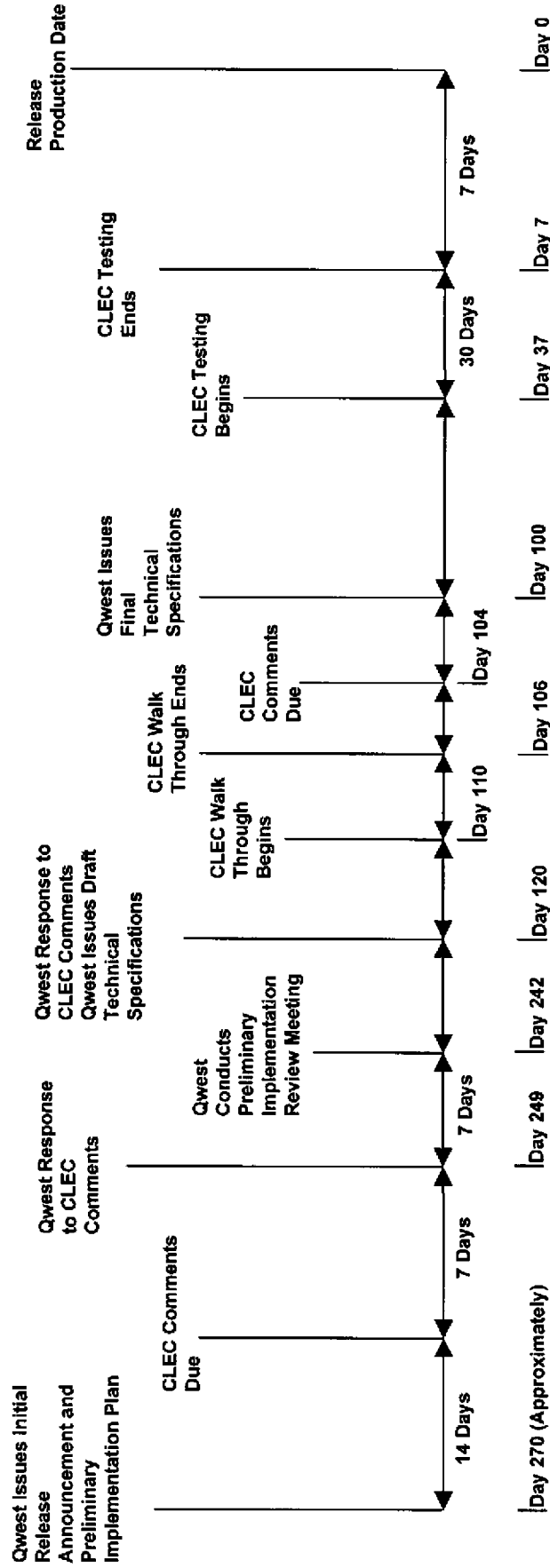
- A summary of changes from the initial notice, including type of changes (e.g., documentation change, clarification, business rule change).
- Final User Guide
- Final Training information
- Final Implementation date.

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Qwest-CLEC Change Management Process Introduction of A New Application-to-Application OSS Interface



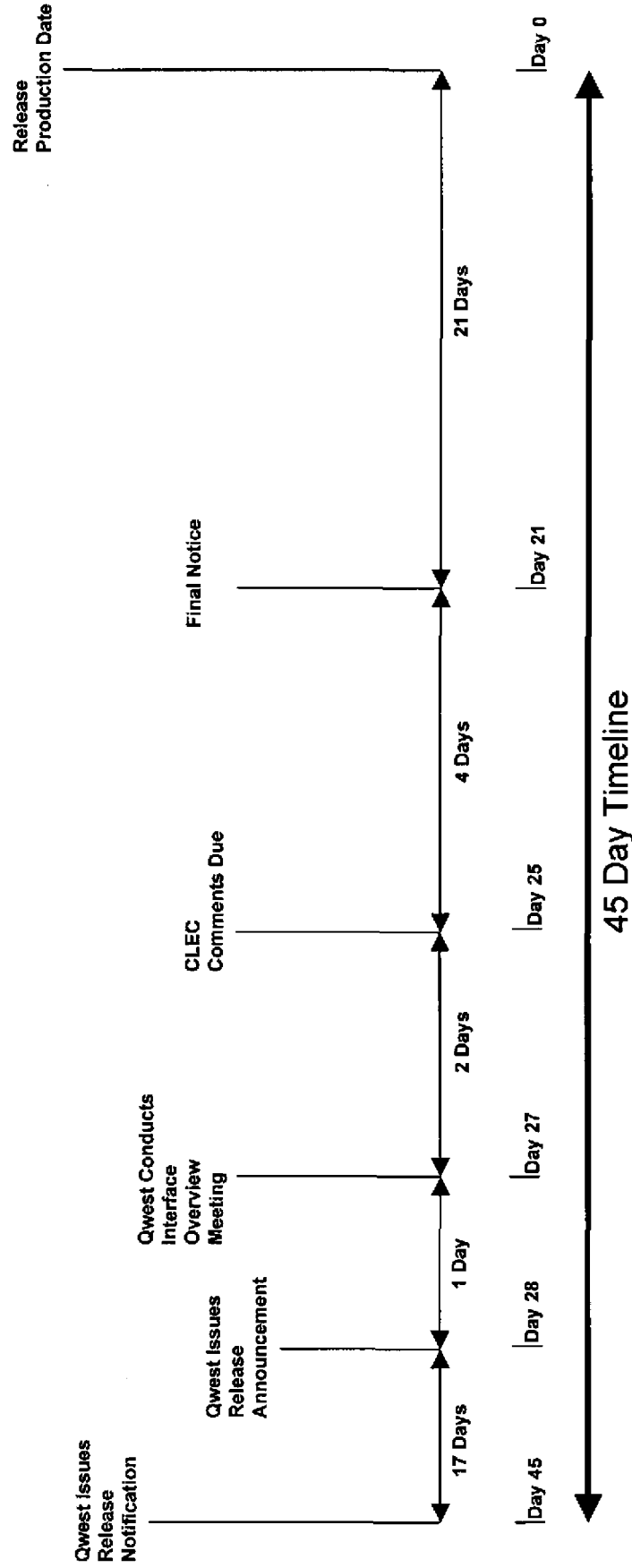
9 Month Timeline (Approximately)

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Qwest-CLEC Change Management Process Introduction of A New Graphical User Interface (GUI) Timeline



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Qwest's Proposed Changes to Existing OSS Interfaces **Language—10-09-01****REVISED 10-16-01 10-30-01**

5.0 CHANGE TO EXISTING OSS INTERFACES

~~Pre-order, Order application to application Change Process (Action item#)~~

As part of its development view, Qwest will prepare a preliminary package of the required changes and will share these plans at scheduled change management meetings.

At the first cmpCMP systems monthly meeting of each quarter, qQwest will also provide a rolling twelve (12) month tbd view of its ossOSS interface development schedule. **(AT&T Comment) (including proposed new releases, new interfaces and, to the extent possible, retirement of existing interfaces).***[AT&T Comment: If there is another place where the rolling 12 month view is discussed, we could put this clarifier there, but this is the only place I have seen it so far.]*

Qwest standard operating practice is to implement 3 major releases and 3 point releases (for IMA only) within a calendar year. Unless mandated as a Regulatory Change, Qwest will implement no more than four (4) releases per **(AT&T Comment) IMA OSS Interface (AT&T Comment) [and no more than two (2) released for other OSS Interfaces.]**~~[AT&T to check—action item]~~ requiring coding changes to the CLEC interfaces within a calendar year. The Major release changes should occur no less than three (3) months apart. **(WCOM COMMENT: IF THIS CLAUSE IS REQUIRED FOR IMA RELEASES ONLY, THERE SHOULD BE LANGUAGE TO ADDRESS THE RELEASE CYCLES OF OTHER OSSs INCLUDED IN THIS DOCUMENT.)** *[AT&T Comment: Qwest was to determine whether it can agree to 2 releases on interfaces other than the IMA.]*

Application-to-Application OSS Interface

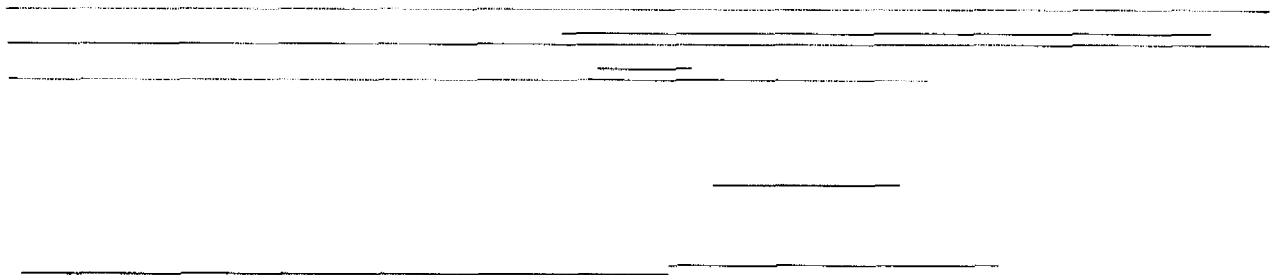
Qwest should make available two (2) versions of an interface between the sunrise and sunset dates. Qwest will support the previous major linterconnect Mmediated Aaccess (imalMA) ima EDI release for six (6) months after the subsequent major ima-edilMA EDI release has been implemented.

Past versions of ~~ima-edilMA EDI~~ will only be modified as a result of production support changes. **(AT&T Comment) When such production support changes are made, Qwest will also modify the related documentation.** Will be implemented in past versions of ima edi. All other changes become candidates for future ima edilMA EDI releases.

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Qwest makes one version of the Electronic Billing Administration (ebtaEBTA) and billing interfaces available at any given time, and will not support any previous versions. (WCOM COMMENT: BECAUSE QWEST DOES NOT SUPPORT VERSIONING FOR EBTA OR BILLING INTERFACES, THE REDESIGN TEAM NEEDS TO MAKE SURE THAT THE RELEASE NOTIFICATIONS FOR THESE INTERFACES ARE PROVIDED TIMELY ENOUGH THAT REQUIREMENTS CAN BE IMPLEMENTED BY CLECS PRIOR TO THE IMPLEMENTATION OF THE NEWEST RELEASE.)

Unless mandated, Qwest will implement no more than four (4) releases requiring coding changes to the CLEC interfaces within a calendar year. These changes should occur no less than three (3) months apart.

I.I. Versioning of TYPE 1 Changes

For TYPE 1 changes, the version number will not be incremented and will not cause the oldest dot version of the current version to be retired as a result of the implemented fix.

II.II. Versioning of TYPE 2 Changes

For TYPE 2 changes that must occur between regularly scheduled releases, Qwest will not retire the oldest version in order to implement the TYPE 2 change. The TYPE 2 change will be implemented as either a dot release or a sub-dot release of all versions (except a retired version), unless the structure of the old version could not accommodate the TYPE 2 change or the old version is scheduled to be retired within the next six months.

If the TYPE 2 change results in an interface implementation, before applicable industry guidelines are finalized at the appropriate industry forums, dot release versioning is issued. An example of dot versioning of A PROVIDER'S QWEST'S LSOG Issue 5 implementation is V5.1.

If the TYPE 2 change results in an interface implementation that is in line with industry guidelines, sub-dot release versioning is issued. An example of sub-dot release of A PROVIDER'S QWEST'S LSOG Issue 5 implementation is V5.0.1.

TYPE 2 changes that occur at the time of a regularly scheduled release will be made in all versions (except a retired version). If the structure or intent of the old version cannot accommodate the change then, via the Prioritization process a joint PROVIDER/QWEST/CLEC decision is made that the mandate should not be implemented in an old version.

III. Versioning of TYPE 3 Changes

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

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Note-Throughout this document italicized text represents OBF language not yet discussed by the CLEC-Qwest Re-Design Team.

For TYPE 3 changes, the base version identity should follow the LSOG issue identity. For example, the first release of A PROVIDER'S QWEST'S LSOG Issue 5 implementation should be V5.0.

IV. Versioning of TYPE 4 AND TYPE 5 Changes

TYPE 4 AND TYPE 5 changes will be implemented as a sub-dot release of all versions, unless the structure of the old version could not accommodate THE TYPE 4 OR TYPE 5 change.

If the TYPE 4 OR TYPE 5 change results in an interface implementation, before applicable industry guidelines are finalized at the appropriate industry forums, dot release versioning is issued. An example of dot versioning of A PROVIDER'S QWEST'S LSOG Issue 5 implementation is V5.1.

If the TYPE 4 OR TYPE 5 change results in an interface implementation that is in line with industry guidelines, sub-dot release versioning is issued. An example of sub-dot release of A PROVIDER'S QWEST'S LSOG Issue 5 implementation is V5.0.1.

Graphical User Interface (GUI)

Qwest makes one version of a GUI available at any given time and will not support any previous versions. (WCOM COMMENT: WOULD IT NOT BE FAIR TO SAY THAT QWEST CANNOT SUPPORT VERSIONS OF ITS IMA GUI INTERFACE BECAUSE IT IS A INTERNET CONNECTION? THUS THERE IS A DIFFERENCE WHEN YOU CONSIDER THE ABILITY TO SUPPORT VERSIONS (EBTA & BILLING) AND THE INABILITY TO SUPPORT VERSIONS. WCOM BELIEVES THIS NEEDS TO BE MADE CLEAR.)

Interconnect mediated access (ima) ima GUI changes for a pre-order or ordering GUI will be implemented at the same time as in conjunction with an IMA EDI release.

5.1 Requirements Review—Application-to-Application Interface (AT&T Comment) **(also see attached timeline)**

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date (date the Qwest release is available for use **(AT&T Comment)** by CLECs), will adhere to in changing existing interfaces. ¹For any CLEC not choosing to implement on the Qwest Release Production Date, Qwest and the CLEC will negotiate a mutually agreed to CLEC implementation time line, including testing.

¹ For a CLEC converting from a prior release, the CLEC implementation date can be no earlier than the weekend after the Qwest Release Production Date, if production LSR conversion is required.

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[illegible]

V.5.1.1 Draft Interface Release Requirements Technical Specifications [make sure CR process and this process are linked properly in final document]

Prior to Qwest implementing a new interface or a change to an existing interface, Qwest will notify CLECs of the draft release requirements technical specifications. **(WCOM COMMENT: LANGUAGE SHOULD BE ADDED THAT INDICATES ANY CLEC AFFECTING CHANGE QWEST WILL HAVE FORMALLY SUBMITTED THROUGH THE CR PROCESS.)**

Notification and confirmation time lines for TYPE 1 are determined on an individual case basis based on the severity of the problem.

Notifications for TYPE 2 changes are based on applicable law and / or regulatory rules.

TYPE 3 time lines are based on CLEC / PROVIDER QWEST agreement in conjunction with the rollout of national guidelines, subject to any overriding regulatory obligations.

Generally, a Type 4 and Type 5 change notification will occur at least 73 calendar days prior to implementing the change. Draft business rules / technical specifications will be produced and distributed to CLECs 66 calendar days prior to implementation. CLECs have fifteen (15) calendar days from the initial publication of draft documentation to provide comments / questions on the documentation. Change confirmation will occur 45 calendar days prior to implementation through publication of final business rules / technical specifications.

Qwest will provide draft technical specifications at least seventy-three (73) calendar days prior to implementing the release unless the exception process (see Section xx) has been invoked. Technical specifications are documents that provide information the CLECs need to code the interface. CLECs have eighteen (18) calendar days from the initial publication of draft technical specifications to provide written comments/questions on the documentation.

For TYPE 4 OR TYPE 5 change requests more or less notification may be provided based on severity and the impact of the change. For example, Qwest can implement the change in less than 45 calendar days.

Documentation of new or revised error messages associated with Type 4 or Type 5 change requests will be provided no later than 30 calendar days prior to implementation date.

VI.5.1.2 Content of Draft Interface Release Requirements Technical Specifications

The Notification letter will contain:

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- Written summary of change(s)
- Target time frame for implementation

~~Draft (AT&T Comment) Technical Specifications documentation, or instructions on how to access (AT&T Comment) the draft Technical Specifications documentation on the Web site. Any cross-reference to updated documentation such as the Users Guide. This type of documentation should also include a summary of changes made to the document.~~
DRAFT DOCUMENTATION, OR INSTRUCTIONS ON HOW TO ACCESS DOCUMENTATION ON THE WEB SITE. (WCOM COMMENT: NEED TO ADD DRAFT TECHNICAL SPECIFICATIONS DOCUMENT.) [AT&T Comment: weren't we going to say "Technical Specifications" here and explain what they include, e.g., such as mapping? or were we to define "Technical Specifications" in the term section of the Master Redline?]

VII.5.1.3 Walk Through of Draft Interface Release Requirements Technical Specifications

~~If requested by one or more CLECs within fourteen (14) calendar days of receiving the initial Release Requirements, Qwest will sponsor a walk through with the appropriate internal subject matter experts. Qwest will hold this walk through no later than thirty (30) calendar days prior to the scheduled implementation. Qwest will sponsor a walk through, including the appropriate internal subject matter experts (SMEs), beginning sixty-eight (68) calendar days prior to implementation and ending no later less than fifty-eight (58) calendar days prior to implementation. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.~~

5.1.3.1 III.1—Walk through Notification Content

This notification will contain:

- Purpose
- Logistical information (including a conference line)
- Reference to draft technical specifications, or **(AT&T Comment) reference to a web site (AT&T Comment) with draft specifications**
- Additional pertinent material

5.1.3.2 III.2—Conduct the Walk-through

~~Qwest will lead the review of technical specifications and technical specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items and notify CLECs of responses 45 calendar days prior to implementation.~~

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users ~~that are provided to CLECs.~~

² Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

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VIII.5.1.4 CLEC's Comments on Draft Interface Release Requirements Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments a written response to Qwest and the CLEC's Account Manager QWEST AND THE CLEC'S ACCOUNT the Ssystems CMP Manager no sooner later less than fifty-five (55) 8 calendar days prior to implementation. Qwest must receive the CLEC's response seven (7) calendar days prior to the date of the Initial Release Requirements. The response will specify the CLEC's questions, issues and any other alternative recommendations for implementation.

IX.5.1.5 PROVIDER QwestWEST Response to Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns WITHIN SEVEN (7) no later less than forty-five (45) calendar days prior to implementation. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final technical specifications.

X.5.1.6 Final Interface Release Requirements Technical Specifications

The notification letter resulting from the CLEC's response comments from the Initial Release Notification will constitute the Final Release Requirements Technical Specifications. *[AT&T Comment: We discussed that after the final specifications, there may be other changes made to documentation or the coding that is documented in the form of addenda. Is there another place in the Master redline where this will be addressed since it probably relates to new releases as well as new interfaces?]*

XI.5.1.7 Content of Final Interface Release Requirements Notification Letter

In addition to the content of interface initial release requirements, The Final Release will include the following:

Reference to Final Technical Specifications, or web site

- Summary of changes from Qwest response to comments
- Qwest response to CLEC comments
- Summary of changes from the prior release, including any changes made as a result of CLEC comments on Draft Technical Specifications

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- Indication of type of change (e.g., documentation change, business rule change, clarification change)
- ☐ ~~Changed requirements pages~~
- Final Joint Test Plan including transactions which have changed
- Joint Testing Period **JOINT TESTING PERIOD**
- Release date
- ☐ ~~Interval before implementation of release~~

Qwest's planned implementation date will not be at least sooner than forty-five (45) calendar days from the date of the final release requirements, unless the exception process has been invoked. ~~Qwest will post notification to provider's web site to inform the CLECs of possible impact to CLEC ordering ability. Qwest will post this information forty-five (45) calendar days prior to the scheduled implementation of such changes, if possible, but not less than thirty (30) calendar days prior to implementation. The implementation time line for the release will not begin until all related documentation is final specifications are provided. Production Support type of Emergency changes that occur within the thirty (30) calendar day test window can that occur without advance notification but will be posted within 24 hours of the change.~~

5.1.8 Joint Testing Period

Qwest will provide a thirty (30)- day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date. **(WCOM COMMENT: WHEN SATE IS EMPLOYED BY A CLEC JOINT TESTING IS NOT REQUIRED, THUS PLEASE ADD CLARIFYING LANGUAGE TO DISTINGUISH BETWEEN JOINT TESTING AND AVAILABILITY TO TEST PRIOR TO IMPLEMENTATION. WE NEED TO ALSO BE CONSISTENT WITH THE USE OF CLEC COMMENTS / CONCERNS.)**

5.2 Requirements Review—Graphical User Interface (GUI) (AT&T Comment) (also see attached timeline)

5.2.1 Draft GUI Release Notice

~~Prior to implementation of of a new interface or a change to an existing interface, Qwest will notify CLECs of the draft release notes and the planned implementation date.~~

~~Notification will occur at least twenty-oneeight (218) calendar days prior to implementing the release unless an exception process has been invoked. This notification maywill include draft user guide information if necessary.~~

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² Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

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CLECs must may provide comments/questions on the documentation no laterless than
17twenty-five (25) calendar days prior to implementation.

Final notice for the release will be published at least twenty-one fifteen (2115) calendar days
prior to production release date-implementation.

5.2.2 Content of Draft Interface Release Notice

The notification will contain:

- Written summary of change(s)
- Target time frame for implementation
- Any cross-reference to draft documentation such as the user guide or revised user guide pages.

In addition to the content of Interface Initial Release Requirements, the Final Release will
include the following:

- ☐ Summary of changes from Qwest response to comments
- ☐ Indication of type of change (e.g., documentation change, business rule change, clarification change)
- ☐ Changed requirements pages
- ☐ Release date

Interval before implementation of release

5.2.3 CLEC Comments on Draft Interface Release Notice

Any CLEC comments must be submitted in writing to the Ssystems CMP Manager. (WCOM
COMMENT: WHEN ARE THESE COMMENTS DUE?)

5.2.4 Qwest Response to Comments

Qwest will consider clecCLEC comments and may address them review and respond with
written answers to all clec issues, comments and concerns regarding in the initial-final GUI
release notice within fourtwo (42) calendar days (AT&T Comment) after receipt of CLEC
comments. The answers will be shared with all clecs, unless the clec question (s) are marked
proprietary. Any changes that may occur as a result of the responses will be distributed to all
clecs in the same final notification letter.

FINAL INTERFACE RELEASE NOTICE

THE FINAL NOTIFICATION LETTER WILL CONSTITUTE THE FINAL RELEASE NOTICE.

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end usersthat are provided to CLECs.

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5.2.5 Content of Final Interface release Notice

CLEC comments to the draft notice may be incorporated into the final notice, which shall include:

- Final notification letter
- Summary of changes from draft interface release notice
- Final user guide (or revised pages)
- Release date

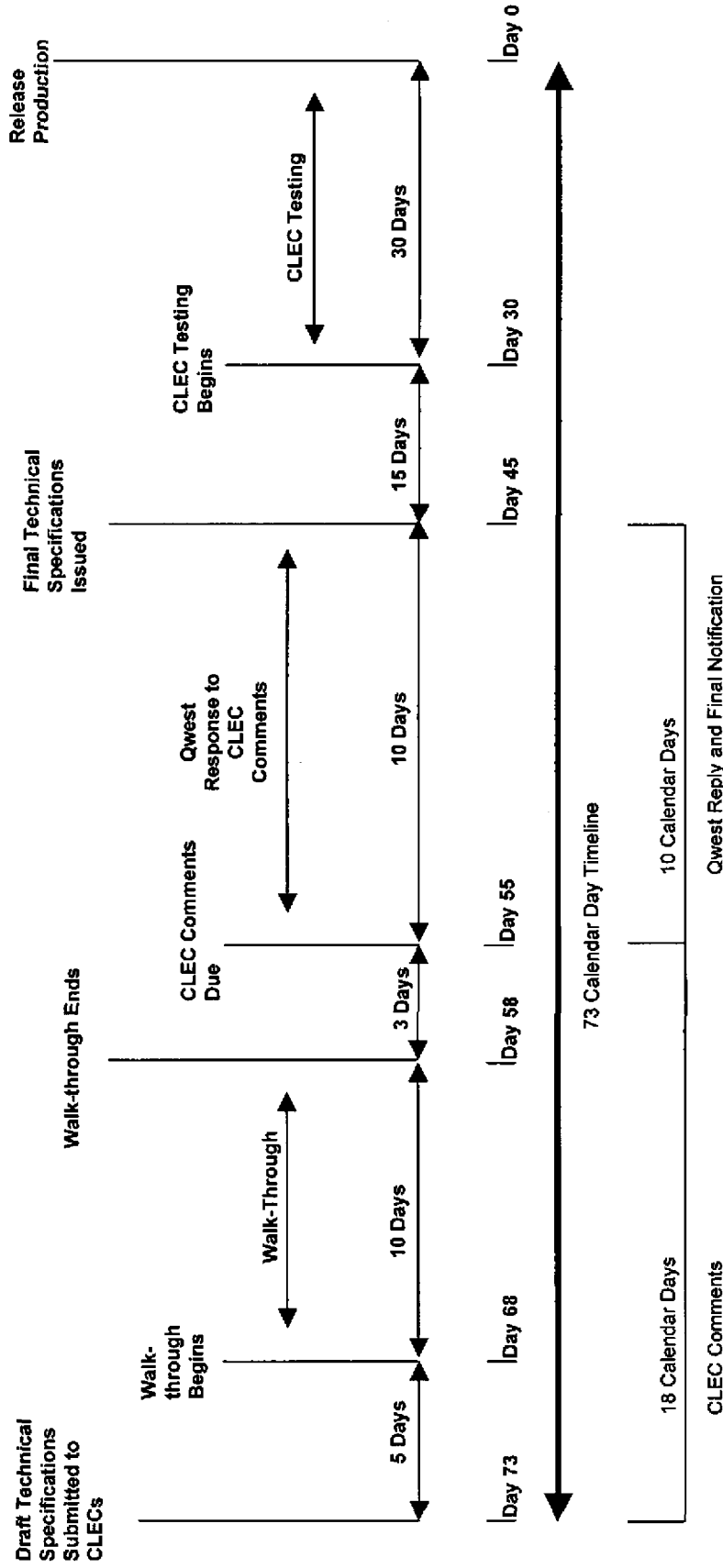
Qwest's planned implementation date will not be no later sooner than twenty-one fifteen (2145) calendar days from the date of the final release notice. Qwest will post this information on the CMP web site. Production support type emergency changes that occur without advance notification will be posted within 24 hours of the change. The implementation time line for the release will not begin until all related documentation is provided.

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

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Note-Throughout this document italicized text represents OBF language not yet discussed by the CLEC-Qwest Re-Design Team.

Qwest-CLEC Change Management Process Changes to An Existing Application-to-Application OSS Interface

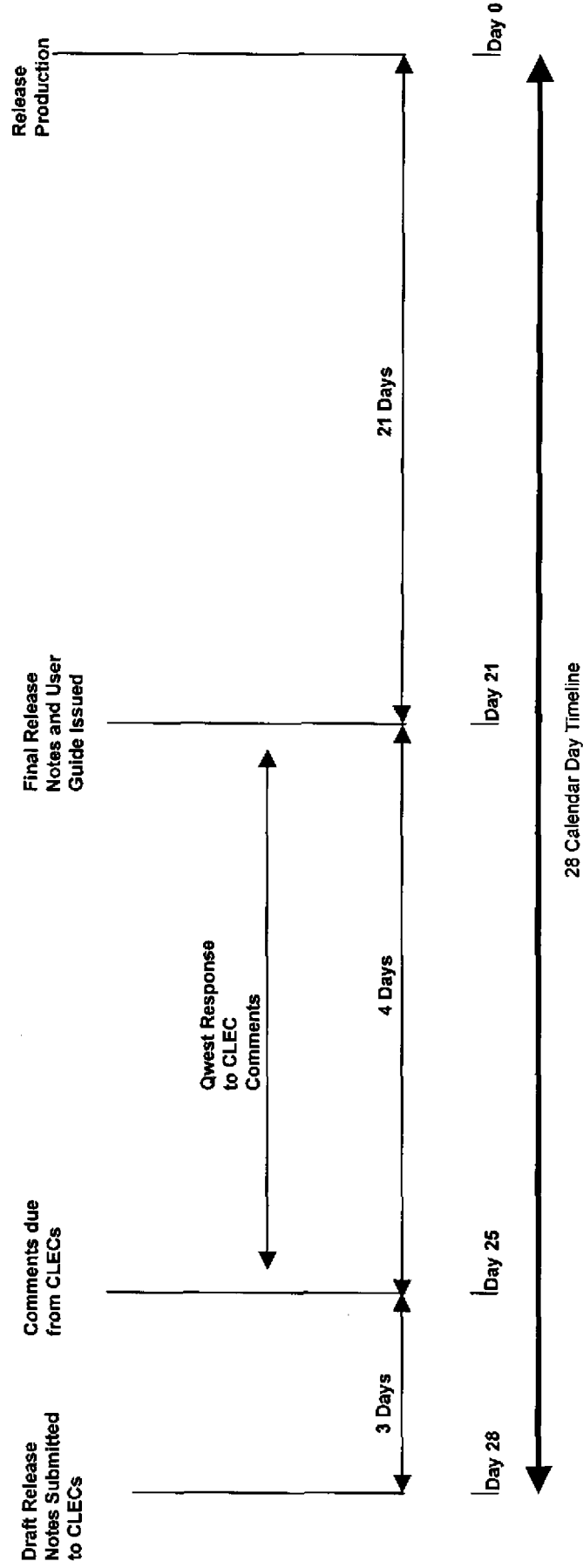


¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

² Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

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Qwest-CLEC Change Management Process Changes to An Existing Graphic User Interface (GUI)



¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

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6.0 Qwest proposed changes to RETIREMENT OF EXISTING OSS INTERFACES **language-revised 10-31-01 (reformatted) 11-01-01**

-The retirement of an existing OSS Interface occurs when Qwest ceases to accept transactions using a specific OSS Interface. This may include the removal of a Graphical User Interface (GUI) or a protocol transmission of information (Application-to-Application) interface.

6.1 Application-to-Application OSS Interface

XVIII.6.1.1 Initial Retirement Plans

—Application-to-Application Interface

At least nine (9) months before the retirement date of Application-to-Application interfaces, Qwest will share the retirement plans via web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent three (3) consecutive months. Qwest will provide thirty (30) calendar day notification of the retirement via web posting and CLEC notification.

XIX.6.1.2 Initial Retirement Notice to CLECs:

Initial Retirement Notices will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement time line (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Targeted retirement date

6.1.3 CLEC Comments to Initial Retirement Notice

CLEC comments to the Initial Retirement Notice are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notice.

6.1.3 Comparable Functionality

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

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Unless otherwise agreed to by Qwest and a CLEC user, when Qwest announces the retirement of an interface for which a comparable interface does or will exist, a CLEC user will not be permitted to commence building to the retiring interface. CLEC users of the retiring interface will be grandfathered until the retirement of the interface. Qwest will ensure **(AT&T Comment) that an interface with comparable functionality is available** no less than six months prior to retirement of an Application-to-Application interface.

6.1.4 Final Retirement Notice

The Final Retirement Notice will be provided to CLECs no later than two-hundred and twenty-eight (228) calendar days prior to the retirement of the application-to-application interface. The Final Retirement Notice will contain:

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

6.2 Graphical User Interface (GUI)

6.2.1 Initial Retirement Plans

At least two (2) months in advance of the target retirement date of a GUI¹, Qwest will share the retirement plans via web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent three (3) consecutive months. Qwest will provide thirty (30) calendar day notification of the retirement via web posting and CLEC notification.

~~XXI~~ 6.2.2 Initial Retirement Notice to CLECs:

Initial Retirement Notices will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement time line (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Targeted retirement date

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users ~~that are provided to CLECs.~~

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6.2.3 CLEC Comments to Initial Retirement Notice

CLEC comments to the Initial Retirement Notice are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notice.

6.2.4 Comparable Functionality

Qwest will ensure comparable functionality no less than thirty-one (31) days before retirement of a GUI.

6.2.5 Final Retirement Notice

The Final Retirement Notice will be provided to CLECs no later than twenty-one (21) calendar days following the initial retirement notice for GUI retirements. The Final Retirement Notice will contain:

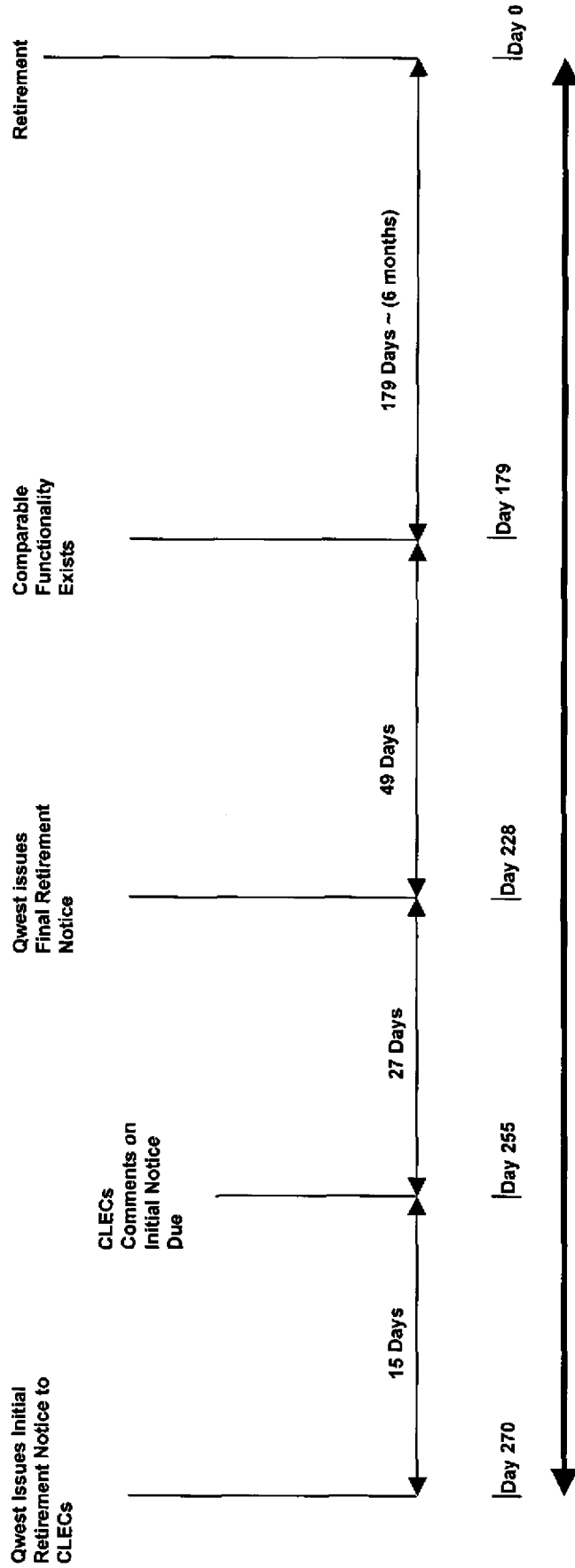
- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users~~that are provided to CLECs.~~

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Qwest-CLEC Change Management Process Retirement of An Existing Application-to-Application OSS Interface

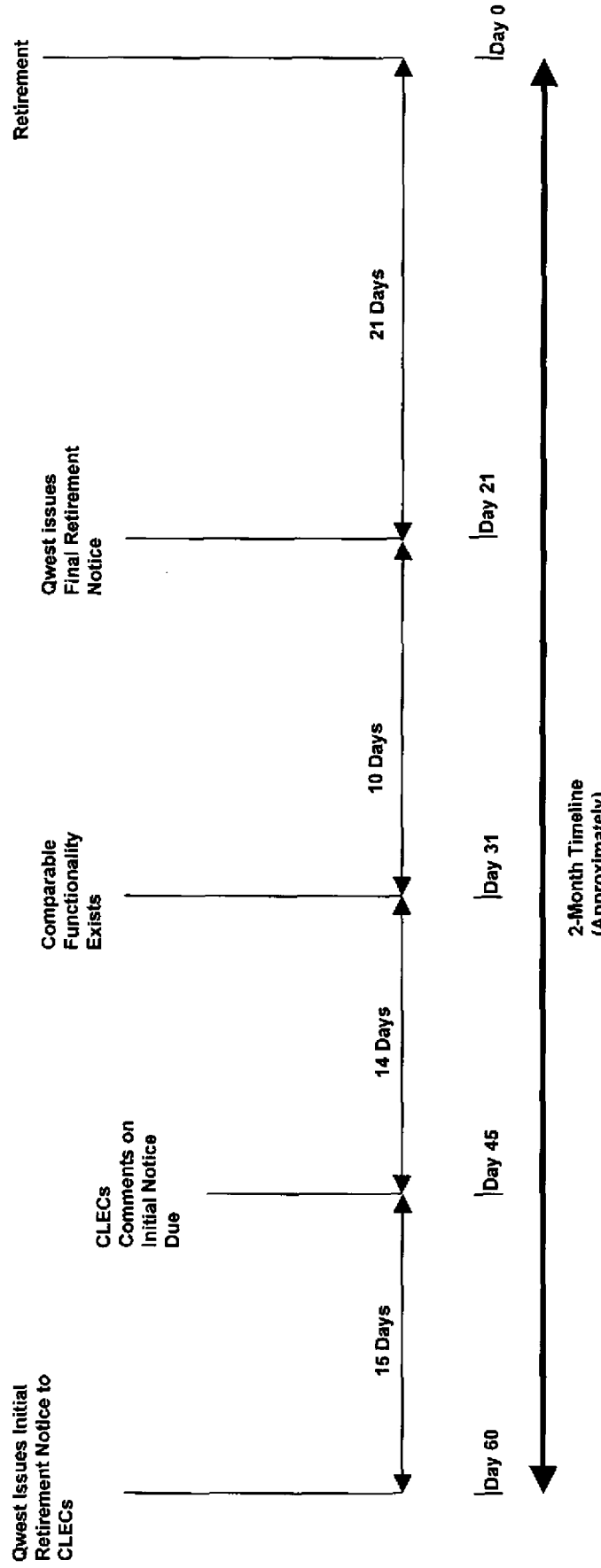


¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users that are provided to CLECs.

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Qwest-CLEC Change Management Process Retirement of An Existing Graphic User Interface Timeline



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□

ADMINISTRATION

7.0 MANAGING THE CHANGE MANAGEMENT PROCESS FROM AUGUST 8, 2001 REDLINED FRAMEWORK

I.7.1 Change Management POC

The provider Qwest and each customer CLEC will designate primary and secondary change management POC(s) who will serve as the official designees for matters regarding this CMP. The primary POC is the official voting member, and a secondary (alternate) POC can vote in the absence of the primary POC for each CLEC.

II. Purpose of Change Management POC

~~The change management POC will serve as the official designee for all matters regarding change management, including:~~

- ☐ ~~Submission of change request forms~~
- ☐ ~~Notification of critical matters, such as Type 1 errors~~

~~The customers CLECs and Qwest will exchange POC information including items such as: must provide the following information to the provider's change management POC:~~

- Name
- Title
- Company
- Telephone number
- E-mail address
- Fax number
- Cell phone/Pager number

III.7.2 Change Management POC List

Creation

~~The provider will create a distribution list and publish this list. Primary and secondary CLEC POCs should be included in the Qwest maintained distribution list. At least a primary customer POC and secondary customer POC should be included in the distribution list. It is the CLECs responsibility to notify Qwest of any POC changes. It is the provider's responsibility to maintain and update the information on the list with the assistance of the customer. This list will be used to update customers on change management issues. The list will be made available to all participating CLECs with the permission of the POCs.~~

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7.3 Preferred Method of Communication Formal

~~The standard methods of communication are mail, e-mail, web site, telephone, and fax. Critical matters will be communicated using the distribution list. The preferred method of communication is e-mail with supporting information posted to the web site.~~

V.7.4 Governing Body

The change management organizational structure must support the CMP. Each position within the organization has defined roles and responsibilities as outlined below.

CMP Team: Representatives are from the ~~customer~~CLECs (or their authorized agents) and the ~~provider~~Qwest. This team meets monthly to review, prioritize, and make recommendations for change management requests. The change management requests are used as input to internal change management processes.

CMP Steering Committee: The CMP Steering Committee consists of representatives from the ~~customer~~CLECs and the ~~provider~~Qwest who will be responsible for managing compliance to the CMP document. The responsibilities of the CMP Steering Committee are:

- On-going commitment*
- Participation in change management meetings/conference calls*
- Reviewing changes/suggestions to the CMP document for submittal to OBF*
- Process improvements*
- Managing meeting schedule/logistics*

A standing agenda item at the regular change management meetings will provide an opportunity for the ~~provider~~Qwest and ~~customer~~CLECs to assess the effectiveness of the CMP. Both the ~~customer~~CLECs and the ~~provider~~Qwest will use this opportunity to provide feedback of instances of non-compliance and commit to taking appropriate action(s).

Provider POC: The ~~provider~~Qwest POC is responsible for managing the CMP. The ~~provider~~Qwest POC will be responsible for maintaining the integrity of the change requests, preparing for and facilitating review meetings, presenting change requests to the ~~provider~~Qwest's internal CMP, and ensuring that all notifications are communicated to the appropriate parties.

¹ Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users~~that are provided to CLECs.~~

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MASTER RED-LINED CLEC-QWEST CMP RE-DESIGN FRAMEWORK
INTERIM DRAFT – Revised 10-16-01, 10-3-01, 9-20-01, 11-1-01, 11-8-01, 11-16-01,
11-29-01, 12-10-01, 12-19-01, 01-03-02, 02-07-02

CustomerCLEC POC: The ~~customer~~CLEC POC will serve as the official designee for all matters regarding CMP, including:

- *Submission of ~~customer~~CLEC change request forms*
- *Notification of critical matters, such as Type 1 errors*

Release Management Team: A team of ~~customer~~CLEC and provider representatives who manage the implementation of scheduled releases.

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8.0 MEETINGS FROM AUGUST 8, 2001 REDLINED FRAMEWORK

Change Management meetings will be conducted monthly.
FROM AUGUST 8, 2001 REDLINED FRAMEWORK

Change Management meetings will be conducted on a regularly scheduled basis, at least on a monthly basis. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, prioritize, manage the implementation of process and system changes –and address change management requests. Qwest will review the status of all applicable change requests. The meeting may also include discussions of Qwest's development view.

CLEC's request for additional agenda items and associated materials should be submitted to Qwest at least five (5) business days by noon (MST) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials at least three (3) business days by noon (MST) in advance of the meeting. Qwest will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring materials of the walk-on items to the meeting.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any qualified CLEC (as defined in this document). Meeting notification must contain an agenda plus any supporting meeting materials. These meetings should be announced at least five (5) business days prior to their occurrence. Exceptions may be made for emergency situations.

The provider is responsible for notifying customers and distributing agendas and other meeting materials to include, but not limited to, actual change requests received from the customers and documentation of industry guidelines and regulatory changes at least seven (7) calendar days in advance of the meeting.

Customers can choose to attend meetings in person or participate by conference call. The provider must make a conference bridge available for meetings. The agenda will include the dial-in number and the access information.

The provider will be responsible for preparing, maintaining, and distributing minutes following the meeting. The draft version of the minutes must be distributed no later than seven (7) calendar

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days after the meeting and must contain the name of each attendee and the company they represent. All attendees, whether in person or by phone, must identify themselves and the company they represent. The provider will also update the status of change requests after the meeting and distribute it following the meeting as part of the meeting minutes.

Emergency or special meetings may be held at the request of the provider or any qualified customer (as defined in this document). Emergency meeting notification must contain an agenda plus any supporting meeting materials. These meetings should be announced at least two (2) business days prior to their occurrence.

8.1 Meeting Materials [Distribution Package] for Change Management Meeting FROM AUGUST 8, 2001 REDLINED FRAMEWORK

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

Meeting materials should include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses
 - New/Active
 - Updated
 - Log
- Issues, Action Items Log and associated statuses
- Release Summary 12 Month Development View
- Monthly System Outage Report
- Any other material to be discussed

Qwest will provide Meeting Materials (Distribution Package) electronically by noon 3 business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the Distribution Package at the Monthly CMP Meeting.

8.2 Meeting Minutes for Change Management Meeting FROM AUGUST 8, 2001 REDLINED FRAMEWORK

Agenda Items for Change Management Meeting

Agenda items should include but are not limited to, the following:

- ☐ Change Request discussions
- ☐ Issues/Actions
- ☐ Release Notice/12 Month Development View

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- ☐ Effectiveness of change management Process
- ☐ Specifications for regulatory or industry originated change requests

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II. Change Management Meeting Action Log and Change Request Status

~~The provider will maintain and distribute at the change management meeting an Action Item Log containing action items from previous meetings and status. Additionally, during the change management meetings, the provider will review status of the customer change requests. The meeting will include discussions of the provider's development view, as well as any customer's suggested development to the provider Operations Support Systems (OSSs).~~

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

~~☐ Qwest will take minutes.~~

~~Qwest will summarize discussions in meeting minutes and include any revised documents such as Issues, Action items and statuses.~~

~~Minutes should be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MST) after the meeting. CLEC comments should be provided within two (2) business days by noon (MST). Revised minutes, if CLEC comments are received, should be distributed within nine (9) business days by noon (MST) after the meeting.~~

~~The provider will take minutes during the meeting. Meeting minutes should include, but are not limited to, the following:~~

- ~~☐ Current status of change requests and Release Notices~~
- ~~☐ Issues/Action items and status~~
- ~~☐ Attendees/Company~~

~~A draft version of the minutes should be distributed to meeting participants for comments or revisions no later than seven (7) calendar days after the meeting. Customers need to respond to the provider with any modifications to the draft version within two (2) business days. Revisions and comments will be incorporated into the final minutes. The final minutes will be distributed within eleven (11) calendar days after the meeting.~~

IV.8.3 ProviderQwest Change Management Process Wholesale CMP Web Site[Need to re-visit - ACTION ITEM #137G]

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

~~To facilitate access to CMP documentation, the providerQwest will maintain CMP information on its web site. The web site should be easy to use and updated in a timely manner. The Web site~~

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should be a well organized central repository for CLEC notifications and CMP documentation. Active documentation including meeting materials (Distribution Package), should be maintained on the website. Change Requests and release notifications should be identified in accordance with the agreed upon naming convention, to facilitate ease of identification. [action item #] Qwest will maintain closed and old versions of documents on the web site's Archive page for 18 months before storing off line. Information that has been removed from the web site can be obtained by contacting the appropriate Qwest CMP Manager. At a minimum, the CMP web site will contain include:

- Current version of the provider Qwest CMP document describing CMP's purpose and scope of setting forth the CMP objectives, procedures, and timelines, including release life cycles.
- Calendar of release dates
- OSS hours of availability
- Links to related web sites, such as IMA EDI, IMA GUI, CEMR, and Notices
- Current CMP escalation process
- CMP prioritization process description and guidelines
- Change Request form and instructions to complete form
- Submitted and open Change Requests and the status of each
- Responses to Change Requests and written responses to CLEC inquiries
- Meeting (formal and informal) information for CMP monthly meetings and interim meetings or conference calls, including descriptions of meetings and participants, agendas, sign-up forms, and schedules
- A log of CLEC and Qwest change requests and associated statuses
- ~~Issue/Action items and statuses~~ Meeting materials (distribution package)
- Meeting minutes
- Release announcements and other CLEC notifications and associated requirements
- Directory to CLEC notifications for the month
- Business rules, SATE test case scenarios technical specifications, and user guides will be provided via links on the CMP web site, based on the LSOG and provider's specific requirements
- Contact information for the CMP POC list, including CLEC, Qwest and other participants (with participant consent to publish contact information on web page).

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REQUIREMENTS REVIEW

I. Draft Interface Release Requirements

Prior to implementing a new interface or a change to an existing interface, the provider Qwest will notify customer CLECs of the draft release requirements.

Notification and confirmation time lines for Type 1 are determined on an individual case basis based on the severity of the problem.

Notifications for Type 2 changes are based on applicable law and / or regulatory rules.

Type 3 time lines are based on customer CLEC / provider agreement in conjunction with the rollout of national guidelines, (See Issue 1714: New Issue Life Cycle Process) subject to any overriding regulatory obligations.

Generally, a Type 4 and Type 5 change notification will occur at least 73 calendar days prior to implementing the change. Draft business rules / technical specifications will be produced and distributed to customer CLECs 66 calendar days prior to implementation. Customer CLECs have fifteen (15) calendar days from the initial publication of draft documentation to provide comments / questions on the documentation. Change confirmation will occur 45 calendar days prior to implementation through publication of final business rules / technical specifications.

For Type 4 or Type 5 change requests more or less notification may be provided based on severity and the impact of the change. For example, the provider Qwest can implement the change in less than 45 calendar days.

Documentation of new or revised error messages associated with Type 4 or Type 5 change requests will be provided no later than 30 calendar days prior to implementation date.

II. Content of Draft Interface Release Requirements

The Notification letter will contain:

- ☐ *Written summary of change(s)*
- ☐ *Target time frame for implementation*
- ☐ *Any cross-reference to updated documentation such as the Users Guide. This type of documentation should also include a summary of changes made to the document*

III. Walk Through of Draft Interface Release Requirements

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~~If requested by one or more customerCLECs within fourteen (14) calendar days of receiving the initial Release Requirements, the providerQwest will sponsor a walk through with the appropriate internal subject matter experts. The providerQwest will hold this walk through no later than thirty (30) calendar days prior to the scheduled implementation.~~

~~IV. CustomerCLEC's Comments on Draft Interface Release Requirements~~

~~If the customerCLEC identifies issues or requires clarification, the customerCLEC must send a written response to the providerQwest and the customerCLEC's Account Manager. The providerQwest must receive the customerCLEC's response seven (7) calendar days prior to the date of the Initial Release Requirements. The response will specify the customerCLEC's questions, issues and any other alternative recommendations for implementation.~~

~~V. Provider Response to Comments~~

~~The providerQwest will review and respond with written answers to all customerCLEC issues, comments/concerns within seven (7) calendar days. The answers will be shared with all customerCLECs, unless the question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all customerCLECs in the same notification letter.~~

~~VI. Final Interface Release Requirements~~

~~The notification letter resulting from the customerCLEC's response from the Initial Release Notification will constitute the Final Release Requirements.~~

~~VII. Content of Final Interface Release Requirements~~

~~In addition to the content of Interface Initial Release Requirements, the Final Release will include the following:~~

- ~~☐ Summary of changes from the providerQwest response to comments~~
- ~~☐ Indication of type of change (e.g., documentation change, business rule change, clarification change)~~
- ~~☐ Changed requirements pages~~
- ~~☐ Release date~~
- ~~☐ Interval before implementation of release~~

~~The providerQwest's planned implementation date will not be sooner than forty-five (45) calendar days from the date of the final release requirements. The providerQwest will post notification to provider's web site to inform the customerCLECs of possible impact to customerCLEC ordering ability. The providerQwest will post this information forty-five (45)~~

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~~calendar days prior to the scheduled implementation of such changes, if possible, but not less than thirty (30) calendar days prior to implementation. Emergency changes that occur without advance notification will be posted within 24 hours of the change. The implementation time line for the release will not begin until all related documentation is provided.~~

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9.0 PRIORITIZATION

9.1 Prioritization Review

The prioritization review provides the forum for reviewing and prioritizing Type 4 and Type 5 change requests. ~~The providerQwest~~ will facilitate the meeting. Both ~~customerCLECs~~ and ~~providersQwest~~ should have appropriate subject matter experts in attendance. Meetings will be held monthly, or more frequently if needed, and are open to all ~~customerCLECs~~. The prioritization review objectives are to:

- Introduce newly initiated ~~customerCLEC~~ and provider change requests.
- Allow ~~customerCLECs~~ to prioritize new change requests and re-rate existing change requests by providing specific input as to the relative importance that ~~customerCLECs~~, as a group, assign to each such change request.
- Provide status on outstanding ~~customerCLEC~~ and provider change requests.
- ~~The providerQwest~~ will distribute all materials fourteen (14) calendar days prior to the prioritization review. The materials will include:
 - Agenda
 - Prioritized spreadsheet of Type 4 and Type 5 change requests
 - Spreadsheet of change requests pending initial rating and re-rating (see Appendix B)
 - New change requests as submitted by initiating ~~customerCLEC~~ or provider

II.9.2 Prioritization Process

During the review, the initiators will present their new change requests and any requests for re-rate. This will be followed by a question and answer session. After all presentations are complete, the voting of change requests will begin.

Re-rate requests will only be accepted from ~~customerCLECs~~ who participated in the initial voting. Once a re-rate is requested, all ~~customerCLECs~~ participating at the subsequent meeting can submit a rating.

~~CustomerCLECs~~ may request and rate a modification to a new change request at the prioritization review, if agreed to by the originating ~~customerCLEC(s)~~. The originating ~~customerCLEC~~ must update the change request with the agreed upon modification.

III.9.3 Voting

Voting should be conducted according to the following guidelines:

- A ~~customerCLEC~~ must either be using the interface impacted by the change request or have a Letter of Intent to use the interface on file with ~~the providerQwest~~ to participate in the vote.

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- *Each customerCLEC is allowed one vote per change request and should have one representative responsible to provide a rating. Each customerCLEC can only assign a rating to a change request at the prioritization review. A rating will not be accepted outside of the prioritization review.*
- *CustomerCLECs may only provide a rating at the meeting where the new change request is introduced. CustomerCLECs that were not present at that meeting may not submit ratings at subsequent meetings, unless there is a request to re-rate.*
- *A customerCLEC may delegate its vote to an authorized agent acting on its behalf by providing a Letter of Authority.*
- *Each participating customerCLEC ranks each change request by providing a rank from 1 (low) to 5 (high). Votes will be averaged to determine order of ranking and results (see Appendix C) will be provided prior to the close of the prioritization review.*
- *CustomerCLECs can defer/pass on voting. A rating of defer or pass will not be averaged in the overall rating.*

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Qwest Proposed Interface Testing Language Updated 11-13-01, Proposed Action Item Language - 11-20-01 - revised 11/27/01

10.0 APPLICATION-TO-TO-APPLICATION INTERFACE TESTING

[Action Item 208 - Add language to address issue of finding a bug in the production code in the test environment.]

[Redesign 02-06-02]

If CLEC is using an application-to-application interface, CLEC must work with Qwest to certify the business scenarios that CLEC will be using in order to ensure successful transaction processing in production. If multiple CLECs are using a service bureau provider, the service bureau provider need only be certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be certified. Qwest and CLEC shall mutually agree to the business scenarios for which CLEC requires certification. Certification will be granted for the specified release of the application-to-application interface. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel if technically feasible.

New releases of the application-to-application interface may require re-certification of some or all business scenarios. A determination as to the need for re-certification will be made by the Qwest coordinator in conjunction with the release manager of each release. Notice of the need for re-certification will be provided to CLEC as the new release is implemented. The suite of re-certification test scenarios will be provided to CLEC with the initial and final Technical Specifications. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel, if technically feasible. If multiple CLECs are using a service bureau provider, the service bureau provider need only be re-certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified.

Qwest will provide a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, and order, and maintenance/repair. The CTE will be developed for each major release and updated for each point release that has changes that were disclosed but not implemented as part of the major release. Qwest will provide test files for batch/file interfaces (e.g. billing). The CTE for Pre-order and Order currently includes:

- Stand Alone Test Environment (SATE)
- Interoperability Testing
- Controlled Production Testing

The CTE for Maintenance and Repair currently includes:

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- CMIP Interface Test Environment (MEDIACC)

~~Qwest will provide test files for . Billing There are two types of testing: Qwest provides initial implementationnew release testing [intended for those CLECs that are not currently in production or that want to test new ordering or pre-ordering transactionsfor which they have not been through testing - move to Terms], and migration testing (from one version to the next) for all types of OSS Interface change requests. Controlled Production Testing is also provided for Pre-Order and Order. [see action item #182 TERMS]production support for all types of change requests. New release Such testing provides the opportunity to test the code associated with releases for Typesthose OSS Interface ex2 through 5 change requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality. Production support testing allows CLECs and Qwest to test changes made as a result of Type 1 change request implementation.~~

I. New Release & Production Support

10.1 Testing Process

~~in the CLEC Test Environment (CTE)~~

~~Qwest will send an industry notification, including testing schedules (see Ssection 5.0X - Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest migrate to the new release must participate in at least one joint planning session and determine:~~

- Connectivity (required)
- Firewall and Protocol Testing (required)
- Controlled Production (required)
- Production Turn-up (required)
- Test Schedule (required)

~~should make arrangements with QwestWhen applicable, CLECs and Qwest will perform interface testing, as mutually agreed upon and documented in a migration project plan~~

~~A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:~~

- Requirements Review
- Test Data Development
- Progression Testing Phase

~~Each testing CLEC will meet with Qwest and agree on its own set of test scenarios that will be included in the test and the test scheduleQwest will communicatepublish any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to the CTE. Provided a CLEC uses the same connectivity option as it uses in production, the CLEC should, in general, experience response times similar to production However, tThe CTE environment is not intended for volume testing.~~

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This section provides information regarding the CTE and the procedures for new release and Production Support testing.

The CTE is a separate environment that contains the application-to-application interface and gateway applications for preordering and ordering. This environment is used for CLEC testing—both new release testing and new entrant testing. CLECs are responsible for establishing and maintaining connectivity into the CTE. Provided a CLEC uses the same software components and similar connectivity configuration connectivity option as it uses in production, the CLEC should, in general, experience response times similar to production. However, this environment is not intended for volume testing. The CTE contains the appropriate applications for pre-ordering and Local Service Request (LSR) ordering up to but not including the service order processor. Qwest intends to include the service order processor as part of the SATE component of the CTE by the end of 2002. (Action #185) Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section X. [02-06-02]

Any special procedures required due to geographical or system differences will be reviewed with the participating CLEC prior to the implementation of their testing phase.

II. New Release Testing

New release testing is the process CLECs use to test an upcoming Qwest systems release that impacts the interface and business rules between CLECs and Qwest.

III. Getting Ready for the New Release Testing

CLECs should be notified of the content of the release through the change management process. CLECs should review the content of the release and determine if they want to participate in the test and what transactions they would like to submit as part of the test.

Qwest will send an industry notification, including testing schedules, to CLECs so they may determine their intent to participate in the test. CLECs wishing to participate in the test should make arrangements with Qwest testing coordinator. Qwest will publish any changes to the schedule.

IV. Production Support Testing

Production Support testing occurs in a production like environment used in support of new entrant testing. New entrant testing is intended for those CLECs that are not currently in production or that want to test new ordering or pre-ordering transactions for which they have not been through testing.

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1.1 TYPES OF CHANGE

The change request should fall into one of the following classifications:

1.1.1.1.1.1.1.1 Type 1 (Production Support) Change

11.0 1.1.1.1.1.1.1.1 Production Support

[Action Item 209 – Qwest to propose language and the time frame for scheduled maintenance, notification and inclusion of known patches or any other CLEC impacting changes, and whether schedule maintenance should be included under production support or in another section in the Redline Document.]

11.1 Notification of Planned Outages [2-07-02]

Planned Outages are reserved times for scheduled maintenance to Operations Support Systems (OSS). Qwest sends associated Notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS.
- Description of the scheduled OSS maintenance activity.
- Impact to the CLECs (e.g. geographic area, products affected, system implications, and business implications).
- Scheduled date and scheduled start and stop times.
- Work around, if applicable.
- Qwest contact for more information on the scheduled OSS maintenance activity.

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel within 2 days of the scheduling of the OSS maintenance activity.

11.2 1.1 Newly Deployed OSS Interface Release

Following the release production date of an OSS Interface change, Qwest will use production procedures for maintenance of software as outlined below. Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest, as set forth in Section 11.2. Problems reported will be known as IT Trouble Tickets. A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow CMP process for documenting the meeting (includes issues/action items and status/solution). Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly OSS CMP Meeting.

11.3 1.2 Request for a Production Support Change

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The IT Help Desk supports Competitive Local Exchange Carriers who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper subject matter expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket. (see Action Item # 189)

Qwest will assign each CLEC-generated and Qwest-generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 111.4. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency release of process, software or documentation (known as a patch). If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming patches, major releases and point releases and any synergies that exist with work being done in the upcoming patches, major releases and point releases.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign a IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach consensus on resolution of the problem and closing the IT Trouble Ticket. If no consensus is reached, any party may use the Technical Escalation Process described in Section X. When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- **No Trouble Found** – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- **Trouble to be Resolved in Patch** – to be used when the IT Trouble Ticket will be resolved in a patch. Qwest will provide a date for implementation of the patch. This is typically applied to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a patch where synergies exist.
- **CLEC Should Submit CMP CR** – to be used when Qwest's investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.
- **Date TBD** – to be used when the IT Trouble Ticket is not scheduled to be resolved in a patch or change, but Qwest may resolve in a patch, release, or otherwise, if possible where synergies exist. This disposition is applied to Severity 3 and Severity 4 troubles.

Qwest will track "Date TBD" trouble tickets and report status and resolution of these trouble tickets and associated systems work on its CMP website. The status of these trouble tickets will be regularly discussed in CMP meetings.

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For "Date TBD" trouble tickets, either Qwest or a CLEC may initiate the Change Request to correct the problem. (See Section 3.0X for CR Initiation.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR. **1.1 Newly Deployed Changes**

~~Following the implementation of an OSS Interface change, Qwest will use existing production procedures for maintenance of a newly released software. Qwest will monitor troubles reported by CLECs to the IT Wholesale Systems Help Desk. A week after the deployment of a software into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. A Type 1 change corrects problems discovered in production versions of an OSS interface.~~

1.2 Request for a Production Support Change

~~Severity 1 (critical—production stopped) and Severity 2 (production or functionality degraded) corrections will be implemented immediately by means of an emergency release of process, software or documentation and CLECs notified according to the IT Wholesale Systems Help Desk procedures (refer to CMP web site). Severity 3 (limited use, but workaround in place) and Severity 4 (low or no impacts to CLECs) types, will not be fixed immediately but will follow the CR process under this CMP. For Severity 3 and Severity 4 production support issues, either Qwest or a the CLEC may initiate the Change Request to correct the Severity 3 or Severity 4 problem. (See Section X for CR Initiation.) Typically, this type of change reflects instances where an technical implementation is faulty or inaccurate such as to cause correctly or properly formatted data to be rejected.~~

~~Instances where Qwest or CLECs misinterpret interface Technical sSpecifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified business processOSS Interface are identified and resolved during the change management review of the change request.~~

11.4 1.3 Reporting Trouble to IT

~~Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The IT Help Desk representative will communicate the ticket number to the CLEC at the time the CLEC reports the trouble.~~

~~If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the IT Help Desk recognizes that it is the same problem, a new ticket is not created. The IT Help Desk documents each subsequent call in the primary ticket.~~

~~If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the~~

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tickets becomes the primary ticket, and the other tickets are linked to the primary ticket. When the problem is closed, the primary and all related tickets will be closed.

11.5 I.4 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process. (See section X)

Severity 1: -Critical Impact

- Critical.
- High visibility.
- A large number of orders or and CLECs are affected.
- A single CLEC cannot submit their business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A software defect in an edit which prevents any orders from being submitted.

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Severity 2: -Serious Impact

- Serious.
- Moderate visibility.
- Moderate to large number of CLECs, or orders affected.
- Potentially affects online commitment.
- Serious slow response times.
- Serious loss of functionality.
- Potentially affects production – potential miss of priority batch commitment.
- Moderate impact on revenue.
- Limited use of product or component.
- Component continues to fail. Intermittently down for short periods, but repetitive.
- Few or small files lost.
- Problems may have a possible bypass; the bypass must be acceptable to CLECs.
- Major access down, but a partial backup exists.

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs.
- Service and/or other work order commitments delayed or missed.

Severity 3: Moderate Impact

- Low to medium visibility.
- Low CLEC, or low order impact.
- Low impact on revenue.
- Limited use of product or component.
- Single CLEC device affected.
- Minimal loss of functionality.
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs.
- Automated workaround in place and known. Workaround must be acceptable to CLECs.

Example:

- Equipment taking ~~hard~~ hardware errors, no impact yet.

Severity 4: Minimal Impact

- Low or no visibility.
- No direct impact on CLEC.
- Few functions impaired.
- Problem can be bypassed. Bypass must be acceptable to CLECs.
- System resource low; no impact yet.

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- Preventative maintenance request.

Examples:

- Misleading, unclear system messages causing confusion for users.
- Device or software regularly has to be reset, but continues to work.

11.6 1.5 Status Notification for IT Trouble Tickets

There are two types of status notifications for IT Trouble Tickets:

- Ticket Notifications: for tickets that relate to only one reporting CLEC
- Event Notifications: for tickets that relate to more than one CLEC

- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk as described in Process X. Event Notifications must will include ticket status (e.g. open, no change, resolved) and as much of the following information as is known to Qwest at the time the notice is sent: [Redesign 02-07-02]

- Description of the problem
- Impact to the CLECs (e.g. geographic area, products affected, business implications)

Ticket status (e.g. open, no change, resolved)

- Estimated resolution date and time if known
- Resolution if known
- Severity level
- Trouble ticket number(s), date and time
- Work around if defined
- Qwest contact for more information on the problem
- System affected
- Escalation information as available

Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

11.6 1.6 Ticket Notification-Response Intervals

-Ticket Response Notification Intervals are based on the severity level of the ticket. "Response Notification Interval for any Change in Status" means that a status notification will be sent out within the time specified from the time a change in status occurs. "NotificationResponse Interval for No Change in Status" means that a status notification will be sent out on a recurring basis

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within the time specified from the last status notification when no change in status has occurred, until resolution. "Notification Response Interval upon Resolution" means that a status notification will be sent out within the time specified from the resolution of the problem. Status notifications sent by Qwest to all CLECs who subscribe to the IT Wholesale Systems Help Desk are known as Event Notifications. Event Notifications will be sent to all CLECs within the time frame set forth in the table below and will include all related system trouble ticket number(s). The affected CLEC(s) and Qwest will attempt to reach consensus on resolution of the problem. When no consensus is reached, any party may use the Technical Escalation Process described in section X.

Status Notification will be provided during the IT Wholesale Systems Help Desk normal hours of operation. Qwest will continue to work severity 1 problems outside of Help Desk hours of operation which are Monday-Friday 6:00 a.m. - 8:00 p.m. Mountain time and Saturday 7:00 a.m. - 3:00 p.m. Mountain time, and will communicate with the affected CLEC(s) as needed. A severity 2 problem may be worked outside the IT Wholesale Systems Help Desk normal hours of operation on a case-by-case basis. Severity three and four tickets can result in a CLEC or Qwest initiated Change Request. The tickets will be resolved as Closed, to be taken to the CMP Process.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Wholesale Systems Help Desk.

<u>Severity Level of Ticket</u>	<u>Notification interval for initial ticket</u>	<u>Notification Interval for any Change in Status</u>	<u>Notification Interval for No Change in Status</u>	<u>Notification Interval upon Resolution</u>
<u>Severity Level 1</u>	<u>Immediate acceptance</u>	<u>Within 1 hour</u>	<u>1 hour</u>	<u>Within 1 hour</u>
<u>Severity Level 2</u>	<u>Immediate acceptance</u>	<u>Within 1 hour</u>	<u>1 hour</u>	<u>Within 1 hour</u>
<u>Severity Level 3</u>	<u>Immediate acceptance</u>	<u>Within 4 hours</u>	<u>48 hours</u>	<u>Within 4 hours</u>
<u>Severity Level 4</u>	<u>Immediate acceptance</u>	<u>Within 8 hours</u>	<u>48 hours</u>	<u>Within 8 hours</u>

Type 1 changes will be processed on an expedited basis by means of an emergency release of software/documentation.

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Additionally, once a Type 1 change is identified, the change management team (see the Managing The Change Management Process section) must determine the nature and scope of the maintenance. Type 1 changes are categorized in the following manner:

Severity 1: ~~Production Stopped: Interface Unusable — Interface discrepancy results in totally unusable interface requiring emergency action. CLEC Orders/Pre-Orders cannot be submitted or will not be accepted by Qwest and manual work-arounds are not feasible. Correction is considered essential to continued operation. Qwest and CLECs should dedicate resources to expedite resolution.~~

~~Acknowledgment Notification — = 1 hour~~
~~Status Notification — = bi-hourly~~

Severity 2: ~~Production Degraded: Interface Affecting — An interface discrepancy that requires a work-around(s) on the part of the CLEC or Qwest. The change is considered critical to continued operation. It does not stop production, but affects key applications.~~

~~Acknowledgment Notification — = 4 hours~~
~~Status Notification — = weekly~~
~~Implementation time — = 14 - 30 calendar days~~

Severity 3: ~~Process Impacted: Pre-order / Order requests can be submitted and will be accepted through normal processes / interfaces. Clarification is considered necessary to ongoing operations.~~

~~Acknowledgment Notification — = 7 calendar days~~
~~Implementation time — = 30 - 60 calendar days~~

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12.0 TRAINING

All changes to existing interfaces, as well as the introduction of new interfaces, will be incorporated into CLEC training.

ProvidersQwest may conduct customerCLEC workshops. CustomerCLEC workshops are organized and facilitated by ~~the providerQwest~~ and can serve any one of the following purposes:

- *Educate customerCLECs on a particular process or business function*
- *Collect feedback from customerCLECs on a particular process or business function*
- *Provide a forum for providersQwest or customerCLECs to lobby for the implementation of a particular process or business function*

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13.0 ESCALATION PROCESS FROM SEPTEMBER 20, 2001 REDESIGN SESSION

FROM SEPTEMBER 20, 2001 REDESIGN SESSION

I.13.1 Guidelines

- The escalation process will include items that are defined as within the CMP scope.
- The decision to escalate is left to the discretion of the customer CLEC, based on the severity of the missed or unaccepted response/resolution.
- Escalations may also involve issues related to CMP itself, including the administration of the CMP. can involve issues related to the CMP, itself
- Escalations involving change requests, The expectation is that escalation should occur only after normal change management procedures have occurred per the CMP.
- ☐ Three (3) levels of escalation shall be available. They are:
 1. The customer's change management director (or designated agent) to provider's change management director
 2. The customer's change management director to provider's account director
 3. The customer's vice-president to provider's vice-president
- ☐ Each level of escalation will go through the same cycle, as follows:

II.13.2 Cycle

- ☐ Item must be formally escalated as an e-mail sent to the Qwest CMP escalation e-mail address, —[http://www.qwest.com/wholesale/cmp/escalations_dispute.html URL to be established] the appropriate provider escalation level.
- Subject line of the escalation e-mail must include:
 - ⊗ CLEC Company name
 - ⊗ "ESCALATION"
 - ⊗ Change Request (CR) number and status, if applicable
- Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided.:
 - ⊗ Description of item being escalated
 - ⊗ History of item
 - ⊗ Reason for Escalation
 - ⊗ Business need and impact
 - ⊗ Desired CLEC resolution
 - ⊗ CLEC contact information including Name, Title, Phone Number, and e-mail address

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- CLEC may request that impacted activities be stopped, continued or an interim solution be established.
- Qwest will acknowledge receipt of the complete escalation e-mail with an acknowledgement of the e-mail no later than the close of business of the following business day. If the escalation email does not contain the following specified information Qwest will notify the CLEC by the close of business on the following business day, identifying and requesting information that was not originally included. When the escalation email is complete, the acknowledgement email will include:
 - Date and time of escalation receipt
 - Date and time of acknowledgement email
 - Name, phone number and email address of the Qwest Director, or above, assigned to the escalation.
- ☐ ~~Subject of e-mail must be customer (Customer Name) ESCALATION (CR# if applicable) Level of Escalation~~
- ☐ ~~Content of e-mail must include~~
 - ☐ ~~Definition and escalation of item~~
 - ☐ ~~History of item~~
 - ☐ ~~Reason for escalation~~
 - ☐ ~~Desired outcome of customer~~
- Qwest will post escalated issue and any associated responses on the CMP web site within 1 business day of receipt of the complete escalation or response. [see action item]
- Qwest will give notification that an escalation has been requested via the Industry Mail Out process [in a time frame to be determined – Jarby]
- Any other CLEC wishing to participate in the escalation must submit an e-mail notification to the escalation URL within one (1) business day of the mail out. The subject line of the e-mail must include the title of the escalated issue followed by "ESCALATION PARTICIPATION"
- ☐ ~~Impact to customer of not meeting the desired outcome or item remaining on current course of action as previously discussed at the prioritization review (if escalation is associated with a change request)~~
- ☐ ~~Impact to customer of a rejected change request~~
- ☐ ~~Contact information for appropriate level including Name, Title, Phone Number, and e-mail ID~~
- ☐ ~~It is not necessary to repeat information for level 2 and 3 escalations. However, the e-mail submission should include any additional information since the last distribution, including the reason that the matter could not be resolved at previous level~~
- ☐ ~~The provider will reply to the escalation request with an acknowledgment of receipt within 1 business day~~

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- ☐ ~~Within seven (7) calendar days of receipt, the appropriate provider change management executive (Level 1-2: Director or Level 3: Vice President) will reply through provider change management with provider position and explanation for that position~~
- Qwest will respond with a binding position e-mail including supporting rationale aAs soon as practicable, but no later than:
 - -For escalated CRs, seven (7) fourteen (14) calendar days of sending the acknowledgement e-mail, Qwest will respond with a binding position e-mail including supporting rationale.
 - For all other escalations, fourteen (14) calendar days of sending the acknowledgment e-mail.
- The escalating customer should CLEC will respond to the providerQwest within seven (7) calendar days with a binding position e-mail. as to whether escalation will continue or the provider response has been accepted as closure to the item
- ☐ ~~If the provider's position suggests a change in the current disposition of the item, a conference call will be held within 1 business day of the provider's decision in order to arrive at consensus with the appropriate executives~~
- ☐ ~~The provider will publish the outcome of the conference call via e-mail~~
- ☐ ~~For escalations associated with Type 1 changes, the provider has a one day turnaround rather than 5 for each cycle of escalation~~
- When the escalation is closed, the resolution will be subject to the CMP.

3.4.2.1 Flow of Escalation Table

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14.0 DISPUTE RESOLUTION PROCESS FROM SEPTEMBER 20, 2001 REDESIGN SESSION

FROM SEPTEMBER 20, 2001 REDESIGN SESSION

CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP [define Good Faith]. In the event that an impasse issue develops, ~~is not resolved through the Escalation Process described in Section xx has been followed without resulting in a resolution, a party may pursue the dispute resolution processes set forth below: the dispute shall be resolved by either method set forth below.~~ Item must be formally noticed as an e-mail sent to the Qwest CMP Dispute Resolution e-mail address, http://www.qwest.com/wholesale/cmp/escalations_dispute.html. ~~{URL to be established}~~ Subject line of the e-mail must include:

• CLEC Company name

• "Dispute Resolution"

• Change Request (CR) number and status, if applicable

• Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided:

- Description of item
- History of item
- Reason for Escalation
- Business need and impact
- Desired CLEC resolution
- CLEC contact information including Name, Title, Phone Number, and e-mail address
- Qwest will acknowledge receipt of the complete Dispute Resolution e-mail within one (1) business day

• Qwest or any CLEC may suggest that the issue be resolved through an Alternative Dispute Resolution (ADR) process, such as arbitration or mediation using the American Arbitration Association (AAA) or other rules. If the parties agree to use an ADR process and agree upon the process and rules to be used, including whether the results of the ADR process are binding, the dispute will be resolved through the agreed-upon ADR process.

~~Qwest or any CLEC affected by the dispute, may request mediation by a third party. If mediation is requested, parties shall participate in good faith. Qwest and the CLECs~~

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~~affected by the dispute must agree to the terms of the mediation, including the payment of costs and fees. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute. If mediation is not successful in resolving the issue, Qwest or any CLEC may use the process set forth below.~~~~[action item for proposed language]~~

- Without the necessity for a prior ADR Process~~[contingent on first bullet]~~, Qwest or any CLEC may submit the issue, following the commission's established procedures, with the appropriate regulatory agency requesting resolution of the dispute. This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs.

~~However, T~~his process does not limit - any party's right to seek remedies in a regulatory or legal arena at any time.

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DEFINITION OF TERMS

<i>Term</i>	<i>Definition</i>
CUSTOMER CLEC	Party originating a request (LSR)
INTERFACE	<p><i>A mechanism to communicate between customer CLEC/provider or trading partners (e.g., paper, GUI, gateway)</i></p> <ul style="list-style-type: none"> <i>A new interface is the provider Qwest's introduction of paper, GUI, gateway, etc., to all customer CLECs for the first time.</i> <i>A change to an interface may include:</i> <ul style="list-style-type: none"> <i>Paper to GUI</i> <i>Changes of EDI to CORBA</i>
ISSUE	<i>The specific OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000)</i>
PROVIDER	Party receiving request (LSR)
RELEASE	<i>Implementation of version (Type 3 change) using a particular interface. A release may include enhancements or customization (Type 1, 2, 4 or 5 change) to an LSOG version by a provider as well as customer CLEC/provider business requirements.</i>
VERSION	<i>The supported OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000) (Type 3 change)</i>

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GLOSSARY OF TERMS

<i>ANSI</i>	<i>American National Standards Institute</i>
<i>ATIS</i>	<i>Alliance for Telecommunications Industry Solutions</i>
<i>CMP</i>	<i>Change Management Process</i>
<i>ECIC</i>	<i>Electronic Communications Implementation Committee</i>
<i>EDI</i>	<i>Electronic Data Interchange</i>
<i>FCC</i>	<i>Federal Communications Commission</i>
<i>GUI</i>	<i>Graphical User Interface</i>
<i>ITU</i>	<i>International Telecommunications Union</i>
<i>LOI</i>	<i>Letter of Intent</i>
<i>LSR</i>	<i>Local Service Request</i>
<i>NRIC</i>	<i>Network Reliability and Interoperability Council</i>
<i>OBF</i>	<i>Ordering and Billing Forum</i>
<i>OIS</i>	<i>Outstanding Issue Solution</i>
<i>OSS</i>	<i>Operational Support Systems</i>
<i>POC</i>	<i>Point Of Contact</i>
<i>RN</i>	<i>Release Notification</i>
<i>TCIF</i>	<i>Telecommunications Industry Forum</i>

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APPENDIX A: CHANGE REQUEST FORM AND CHECKLIST

I. Appendix A-1: Change Request Form

(1) Internal Reference # _____ (2) Date Change Request Submitted ____/____/____

- (3) ☐ **TYPE 1 (EMERGENCY)** (4) ☐ **TYPE 2 (REGULATORY)** (5) ☐ **TYPE 3 (INDUSTRY)**
☐ Severity 1 (stops production)
☐ Severity 2 (impacts production)
☐ Severity 3 (major w/work around)

(6) ☐ **TYPE 4 (PROVIDER)** (7) ☐ **TYPE 5 (CUSTOMER/CLEC)**

(4) Customer/CLEC _____

(5) Originator _____ (6) Phone _____

(7) Originator's Email Address _____ (8) Fax _____

(9) Alternate Contact _____ (10) Alt Phone # _____

(11) Title of Change _____

(12) **Category** ☐ Add New Functionality ☐ Change Existing

(13) **Interfaces Impacted**

- ☐ Pre-Ordering
- ☐ Ordering
- ☐ Maintenance
- ☐ Manual
- ☐ Billing
- ☐ Business Rules
- ☐ Other

(14) Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.)

(15) Known dependencies

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(16) List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

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This Section to be completed by Provider ONLY.

(17) Change Request Log # _____ (18) Clarification ☐ Yes ☐ No

(19) Clarification Request Sent ____/____/____ (20) Clarification Response Due ____/____/____

(21) Status _____

(22) Change Request Review Date ____/____/____ (23) Target Implementation Date ____/____/____

(24) Last Modified By _____ (25) Date Modified ____/____/____

(26) Change Request Activity

(27) Rejected Change Request

- ☐ Cost/benefits
- ☐ Resource commitments
- ☐ Industry or regulatory direction
- ☐ Provider direction
- ☐ Other

(28) Cancellation Acknowledgment Customer CLEC _____ Provider _____ Date ____/____/____

(29) Request Escalation ☐ Yes ☐ No

(30) Escalation Considerations

(31) Agreed Release Date ____/____/____

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This section to be completed by Provider – Internal Validation of Defect Change Request.
(32) Defect Validation Results:

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H.9.0 Appendix A-2: Change Request Form Checklist

All fields will be validated before Change Request is returned for clarification.

Field	Checklist	Description	Instructions	Action Required
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the ProviderQwest's change control process.	No action	
2	Mandatory	Date Change Request sent to Provider.	Return to Sender	Date entry required
3	Mandatory	Indicate type of Change Request: CustomerCLEC or Provider initiated Industry Standard or Regulatory.	Return to Sender	Company designation required
4	Mandatory	Enter company name for the Change Request.	Return to Sender	Company name required
5	Mandatory	Enter originating company's Change Control Initiator's name.	Return to Sender	Initiator's name required
6	Mandatory	Enter originating company's Change Control Initiator's phone number.	Return to Sender	Initiator's phone number required
7	Mandatory	Enter originating company's Change Control Initiator's Email address.	Return to Sender	Initiator's Email address required
8	Mandatory	Enter originating company's Change Control Initiator's fax number.	Return to Sender	Initiator's fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to Sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to Sender	Alternate contact number required
11	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to Sender	Title required – maximum length 40 characters.
12	Mandatory	Identify request category for the Change Request.	Return to Sender	Category required
13	Mandatory	Identify originating company assessment of impact	Return to Sender	Entry required
14	Mandatory	Describe the proposed Change Request, indicating the purpose and benefit of request. If additional space is needed, use additional sheet.	Return to Sender	Description of Change Request required
15	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to Sender	Entry required

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MASTER RED-LINED CLEC-QWEST CMP RE-DESIGN FRAMEWORK
INTERIM DRAFT – Revised 10-16-01, 10-3-01, 9-20-01, 11-1-01, 11-8-01, 11-16-01,
11-29-01, 12-10-01, 12-19-01, 01-03-02, 02-07-02

Field	Checklist	Description	Instructions	Action Required
16	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to Sender	Supporting documentation must accompany request
17	Mandatory Provider	A Change Request Log Number generated by the "Change Request Logging system" upon receipt of the Change Request. The number should be sent back to the initiator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to Sender	Log number – system generated
18	Conditional Provider	Indicates whether clarification is needed on the Change Request.	Return to Sender	
19	Conditional Provider	Date clarification request sent to Initiator.		
20	Conditional Provider	Date clarification due back from Initiator.	Return to Sender	
21	Mandatory Provider	Indicate status of proposed Change Request (i.e., clarification, validation, pending, etc)		
22	Mandatory Provider	Assign date when Change Request will appear on agenda.	Return to Sender	
23	Mandatory Provider	A soft date for implementation. Updated based on Candidate Release Package info.		
24	Mandatory Provider	Field that communicates who last updated the request.		
25	Mandatory Provider	Field that communicates when the last update occurred.		
26	Mandatory Provider	Change Request results captured from the Change Review meeting.		
27	Conditional Provider	Cancelled Change Request reasoning.	Return to Sender	
28	Conditional Provider	Concurrence with Change Request originating company. Show date of concurrence.	Return to Sender	
29	Conditional Provider	Change Request Escalation indication.		
30	Conditional Provider	Detailed description of the escalation considerations.		

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MASTER RED-LINED CLEC-QWEST CMP RE-DESIGN FRAMEWORK
INTERIM DRAFT - Revised 10-16-01, 10-3-01, 9-20-01, 11-1-01, 11-8-01, 11-16-01,
11-29-01, 12-10-01, 12-19-01, 01-03-02, 02-07-02

<i>Field</i>	<i>Checklist</i>	<i>Description</i>	<i>Instructions</i>	<i>Action Required</i>
31	Mandatory Provider	Indicate agreed release date from Project Release Plan.		
32	Mandatory Provider	Results of Internal Defect Validation		

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APPENDIX B: CHANGE REQUEST PRIORITIZATION FORM

Item #	Change Request #	Description of Change Request	Customer CLEC Rankings	Comments
		Title: Description: Process: System: Primary Area: LSOG Version: Initiator/Date:	Overall = Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	
		Title: Description: Process: System: Primary Area: LSOG Version: Initiator/Date:	Overall = Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	
		Title: Description: Process: System: Primary Area: LSOG Version: Initiator/Date:	Overall = Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	

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APPENDIX C: CMP PRIORITIZATION PROCESS EXAMPLE

Example: Change Request E2 is prioritized highest. Since E3 and E5 are tied, they will be re-ranked and prioritized according to the re-ranking.

<i>Pre-order</i>	<i>CustomerCLE C #1</i>	<i>CustomerCLE C #2</i>	<i>CustomerCLE C #3</i>	<i>TOTAL</i>	<i>Average</i>
<i>E1</i>	5	5	5	15	5
<i>E2</i>	1	2	1	4	1
<i>E3</i>	3	1	5	9	3
<i>E4</i>	5	3	4	12	4
<i>E5</i>	2	5	2	9	3
<i>E6</i>	4	4	3	11	4

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EXHIBIT B

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
13G	Action	August 8 Meeting	CMP Web Site	Re-visit the redlined CMP framework element, "Qwest Wholesale CMP Web Site" at a later working session.	Core Team	Sep-20 Extended to Nov-13 Nov-27-29 TBD	Re-visit this element to insure all items are addressed in the re-designed CMP framework.
40	Issue	August 14 Meeting	Notifications	Are Call Center outages included in the "outages" sub-category – should they be?	Qwest – Judy Schultz Jeff Thompson	Sep-5 Extended to Sep-20 Oct-15 Nov-1 Nov-13 Nov-27-29 Dec-10-11 TBD	Qwest will provide notice on the process via mail-out 10/29: Posted on CMP Redesign web site—"Qwest Center Outage Notification Process-Posted 10-29-01" Qwest is prepared to discuss and close this Action Item. 11/29: Terry Bahner/ATT to review and core team to close at next session. 2/5: Jeff Thompson to provide a 1-pager at the next Redesign on process if a Call Center outage should occur. See Item #176
68	Action	Sep 6 Meeting	271 Workshop 18 COIL Items	Review the 18 items and verify that they will be addressed in the CMP re-design	Core Team	On-going	
69	Action	Sep 6 Meeting	Qwest Status Report	Review redlined document and Qwest status report prior to scheduled filing. 9/18: Qwest to provide documents to participants no later than Sep 27 for review. 10/2: Qwest will continue to provide documents to redesign team for review prior to filings. 12/11 Provide dates for Jan and Feb filing dates	Core Team Andy Crain	On-going	COMPLETED: Andy Crain to distribute documents no later than Sep 27 for re-design team review prior to Oct 2 meeting. Will visit at each meeting. Qwest will update filing status at Dec 10 th meeting. PENDING: 01/24/02: Andy Crain will send Status Report to Redesign team for review

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							after the Feb 5-7 working session. 2/5: Qwest will file a Status Report on the 15 th , or next business day, of every month, Redesign Team shall have an opportunity to review and provide comments before the filing. Related to #89
88	Action	Sep 18 Meeting	CMP Process	Propose language for "proprietary CR"	Core Team	Sep-20 Extended Oct-3, -16 Nov-1 TBD	Related to #89
89	Issue	Sep 18 Meeting	CMP Process	What is the process for a CLEC-originated CR deemed proprietary and a process to handle proprietary CLEC questions and comments?	Core Team	Oct-3 Extended Oct-16 Nov-1 TBD	Related to #88 Issue reworded on Oct 30 to address proprietary CLEC questions and comments.
93	Action	Sep 18 Meeting	Exception Process	What is the process for an Exception item during prioritization?	Core Team	Sep-20 Extended Nov-1 TBD	Related to #215
94	Issue	Sep 20 Meeting	CR Process	How will the CR Process address 'draft' industry guideline changes?	Core Team	Oct-3 Extended Oct-16 Nov-1 TBD	
100	Action	Sep 20 Meeting	Schedule Working Sessions	Determine the elements for CMP Product/Process	Core Team	Oct-16 Extended Nov-13 TBD	Related to #176 Core Team to do some pre-meeting work to determine additional elements for Product/Process.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
104	Action	Oct 2 Meeting (Meagan – Covad)	Parity in changes	Who has responsibility for determining whether or not a change in retail is CLEC impacting and requires notification via the CMP process	Qwest – Judy Schultz	Oct-16 Extended Nov-4 Nov-13 Nov-27-29 Dec-10-11 TBD	Related to #105—to be closed after Core Team reviews sample retail mail- outs. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec-10-11 next session.
105		Oct 2 Meeting (Dixon – WCom)	Parity	Provide training package and check list used by Qwest to train retail in identifying changes that impact CLECs Provide sample mail outs for retail changes – (Retail only change and Retail CLEC impacting change) Code of Conduct – what is the disciplinary action when guidelines – (includes compliance) are not adhered to	Qwest – Judy Schultz	Oct-16 Extended Nov-4 Nov-13 Nov-27-29 Dec-10-11 TBD	This replaces # 95; related #104 Option 1 – Qwest sends everything Option 2 – Qwest screens notification to only CLEC impacting changes 10/16 COMPLETED: This checklist is on the web on the CMP re-design web site under Re-Design documentation 11/1: Examples of mail outs for retail changes are posted on the web site and shared as hand-out at the 11/13 session. 11/29: Need to review Mitch/AT&T questions on insuring parity between retail and wholesale. Add to agenda for the Dec-10-11 next session. Qwest is prepared to discuss and close this Action Item.
106	Action	Oct 2 Meeting	Definition of terms	Define terms used in Paragraph 2 in the body of the document (scope and introduction) and in the glossary of terms table on page 41 of the Master Red lined document. What is OBF's definition?	Core Team	Ongoing	11/30: See Qwest Proposed TERMS Language - 11-30-01 Terms: Design, Development, Notification, Testing, Implementation and Disposition; also related to #246 Qwest is prepared to discuss and close this Action Item.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
107	Action	Oct 2 Meeting	Scope—Roles and Respon.	Define "Roles and Responsibilities" of Qwest and CLEC representative/s as it appears on Paragraph 3 of the Scope 11/1: Define responsibility for a primary and secondary POC and a CMP Team Representative.	Core Team	Nov-4 TBD	11/20: See Qwest Proposed Managing the CMP Language – Revised 11-20-01 Qwest is prepared to discuss and close this Action Item.
108	Action	Oct 2 Meeting	PCAT – Tech Pub Notification	Research tech pubs and PCAT changes that have been released thus far as they relate to 271 workshop commitments. Provide a list of notifications that are to be released 10/16: Can Qwest improve the delivery timeframe for previously released changes to PCAT and Tech Pubs? 11/29: Do the CLECs still want Qwest to do retroactive red lining? Is Qwest able to do retroactive red lining on Tech Pubs? 2/5: Qwest needs to determine if this can be done	Qwest – Judy Schultz	Oct-16 Extended Nov-4 Nov-13 Dec-10-11 TBD	Also present at the Oct 17 CMP Product/Process meeting 10/16: Already released PCAT changes will be highlighted in Green and will be available March 2002 (estimated 3 months of work).
110	Action	Oct 3 Meeting	Terms: CLEC Operating Procedures	Define "CLEC operating procedures" under Terms table in master redline document. 11/1: Subcommittee will provide the Core Team with an expanded definition for CLEC impacting besides the current 4 items.	Qwest— Andy Crain (Susie Bliss) Core Team Sub- Comm. Core Team	Oct-16 On-going Nov-13 Nov-27-29 TBD	Will be discussed offline on Oct 5 – Susie Bliss (develop checklist) 10/16: Define the term "operating procedures" at a later session. 11/1: Subcommittee (<u>Judy Schultz</u> , Terry Bahner, Terry Wicks, Liz Balvin, Karen Clausen) to present at the 11/13 meeting expanded list of CLEC

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							impacting situations. Related to #137 Qwest is prepared to discuss and close this Action Item.
115	Action	Oct 3 Meeting	SGAT Language	Revisit proposed SGAT language at the conclusion of the Re-Design process.	Core Team	On-going	
116	Issue	Oct 3 Meeting	New Product Offerings	Are new product offerings brought to CMP as a Change Request?	Core Team	TBD	See Qwest Proposed Product/Process Change Request Initiation Process Qwest is prepared to discuss and close this Action Item.
118	Action	Oct 3 Meeting	Criteria for Deny	State the criteria for Deny (reasons why) for the CR process.	Qwest— Judy Schultz	Oct 16 Extended Nov 1 Nov 13 Dec 10 11 TBD	Criteria examples: Specific regulatory ruling Qwest Policy Business (e.g., Cost) Qwest is prepared to discuss and close this Action Item.
126	Issue	Oct 16 Meeting	Exception Process	What process allows CRs to be submitted less than the agreed upon timeframe for CR presentation at the upcoming CMP meeting? Will the Exception Process accommodate this situation?	Core Team	Nov 1 TBD	Language for the Exception Process and/or CR Initiation Process.
133	Issue	Oct 16 Meeting	Terms	Define "major" and "point" OSS interface releases.	Core Team	On-going	Defined under Terms o Release - Major - Point

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							11/29: Point release was defined. Major release needs additional work. Define "Release" as well. Related to #246 Qwest is prepared to discuss and close this Action Item.
137	Issue	Oct 30 Meeting	Terms	Define Changes to the OSS interfaces that may not require a CLEC to make coding changes but may affect CLEC process or operations. 11/29: Determine whether a process is necessary to address non-coding changes.	Core Team	On-going TBD	Related to #110-subcommittee to expand definition 11/29: Do a search in the Master Red Line for "Code" and/or "Non-coding" to determine whether a process is needed to address non-coding changes. Non-coding changes may not require a CLEC to make coding changes but may affect CLEC operations or processes. Qwest is prepared to discuss and close this Action Item.
139	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Propose language for maximum number of major releases for OSS interfaces, other than IMA.	Qwest— Jeff Thompson	Nov-13 TBD	01/14: There will be a maximum of four major releases for all OSS interfaces, as well as for IMA. Qwest is prepared to discuss and close this Action Item.
140	Action	Oct 30 Meeting	Note	Reword "note" to accommodate weekends and holidays on all timelines as attachments to the OSS Interface elements.	Qwest— Judy Schultz	Nov-13 Extended TBD	11/29: Elements: • Change to An Existing OSS Interface

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				11/29: Qwest to evaluate if the timelines should be in business days or calendar days.			<ul style="list-style-type: none"> • Introduction of a New OSS Interface • Retirement of an Existing OSS Interface <p>01/28: “The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.”</p> <p>Qwest is prepared to discuss and close this Action Item.</p>
141	Action	Oct 30 Meeting	Change to An Existing OSS Interface	Define what will be included in the Technical Specifications.	Qwest— Jeff Thompson	Nov 13 Extended TBD	<p>12/11: Qwest is prepared to include the following language in the Master Redlined Framework and close this issue: The technical specifications include:</p> <ul style="list-style-type: none"> • A chapter for each transaction or product which includes a business (OBF forms to use) description, a business model (electronic transactions needed to complete a business function), trading partner access information, mapping examples, data dictionary <p>Appendices may include:</p> <ul style="list-style-type: none"> • Developer Worksheets

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							<ul style="list-style-type: none"> • IMA Additional Edits (edits from backend OSS systems) • Develop Worksheets Change Summary (field by field, release by release changes) • EDI Mapping and Code Conversion Changes (release by release changes) • Facility Based Directory Listings • Generic Order Flow Business Model <p>Qwest is prepared to discuss and close this Action Item. See #246</p>
142	Issue	Oct 30 Meeting	Change to An Existing OSS Interface	Does the team agree that the CR Initiation Process and Prioritization Process have taken place before a change is implemented according to the Changes to an Existing OSS Interface Process? 12-11-01 Clarify in the Master Redline that CRs precede any changes within the scope of CMP (exceptions?, production support?) (AT&T item # 14)	Core Team	Nov-13 Extended Nov-27-29 TBD	Qwest has stated that Industry Guideline and Regulatory changes will not be prioritized, but a CR will be shared with CLECs at the Systems CMP Meeting.
143	Issue	Oct 30 Meeting	EDI Implem. Guideline	Is the EDI Implementation Guideline under the scope of CMP? 2/6: Does Scope include documentation?	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	<p>10/31: The EDI Implementation Guideline will follow the CMP guidelines and timeframes.</p> <p>Qwest is prepared to discuss and close this Action Item.</p>

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
145	Issue	Oct 30 Meeting	OSS Interface CR Initiation	CLEC comments and Qwest responses should be communicated to CLECs. Create a method to communicate via web site.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	
146	Issue	Oct 30 Meeting	OSS Interface CR Initiation	What are the criteria used to determine 'level of effort' (i.e., S, M, L, XL) for a release?	Qwest— Jeff Thompson	Nov-13 Extended Nov-27-29 TBD	12/13: Language included in Master Redline. 01/14: The CLECs requested that Qwest no longer use a standard set of T-shirt size estimates. Instead, Qwest will give Level of Effort estimates via an estimate of the number of hours necessary to complete each CR for CRs generated after 01/01/02. The Core Team must review the Master Redline to find, and change, all references to T-shirt sizing.
148	Issue	Oct 30 Meeting	OSS Interface CR Initiation	Specify/clarify process for Qwest-initiated CRs on page 1 of proposed Qwest language document. See AT&T and WorldCom comments in Master Redline.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	Qwest is prepared to discuss and close this Action Item. Qwest is prepared to discuss and close this Action Item.
149	Issue	Oct 30 Meeting	New OSS Interface CR	Is a CR required for a new OSS interface? And would it go through the Prioritization/Ranking process?	Core Team	Nov-13 Extended Nov-27-29 TBD	11/13: A CR for a new OSS interface may go through prioritization depending on reason for introduction. Qwest is ready to discuss and close this item.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
151	Issue	Oct 31 Meeting	Redesign Core Team Expectations/ Respons.	Define level of participation for the CMP Redesign effort. In addition, provide language addressing preparedness for each working session.	Core Team Sub- committee	Nov-13 Extended Nov-27-29 TBD	Subcommittee: <u>Leilani Hines, Sharon Van Meter, Terry Wicks</u> 11/9: Proposed language posted on 11/9. Qwest is prepared to discuss and close this Action Item.
152	Issue	Oct 31 Meeting	Training	When is Training available when a new GUI is introduced (after the Release Production Date, or is it available with the Final Notice and User Guide)?	Qwest— Judy Schultz	TBD	To be addressed during Training element discussion. 11/1: Training will be available when the Final notice is issued by Qwest. Qwest is prepared to discuss and close this Action Item.
153	Issue	Oct 31 Meeting	Timelines	Do we need to include language that the timelines under the CMP master redlined are 'defaults'? If so, what is the language to address all timelines such as New/Retired OSS Interface?	Core Team	Nov-13 Extended Nov-27-29 TBD	11/20: See Qwest Proposed Managing the CMP Language – Revised 11-20-01 Qwest is prepared to discuss and close this Action Item.
156	Issue	Oct 31 Meeting	Admin— Notification Methods	Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	See: Qwest Proposed Managing the CMP Language – 10-22-01 Qwest is prepared to discuss and close this Action Item.
158	Action	Nov 1 Meeting	CPAP/PID	What is the process to manage changes to performance reporting, calculation, etc.? How do we handle the overlaps between what is being	Core Team	Nov-13 Extended Nov-27-29 TBD	CO PUC expected to issued order on Nov 5. 11/13: Becky/CO PUC provided the Team with an overview of the order.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				negotiated at the CMP Redesign and CPAP-like procedures? 11/1: Status at the 11/13 CMP redesign session.			
162	Action	Nov 1 Meeting	Terms	Define "CLEC", "Qwest" and "sub-systems"	Core Team	TBD	11/30: See Qwest Proposed TERMS Language - 11-30-01 Qwest is prepared to discuss and close this Action Item. See #246
163	Issue	Nov 1 Meeting Jan 23 Meeting	CR Process	Where will a CR that impacts both an OSS interface and process be addressed—at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue.	Core Team	Nov-13 Extended Nov-27-29 TBD	11/19/01: When a CLEC or Qwest submits a CR which addresses both systems and product/process it will be addressed in the Systems Monthly CMP Meeting. The CR will follow the CMP and may be transferred from one forum to another if warranted to adequately attend to the request. The Related product or process CR will still be subject to the applicable CMP timelines. 1-23-02: A seamless transfer between Product/Process and Systems requests. Identify decision point in the P&P and systems process as to whether the CR is subject to system prioritization. Information to be included in the response as to whether there is a mechanized solution.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN
 Revised—February 7, 2002

#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
167	Issue	Nov 1 Meeting	Prioritization for Regulatory Change	Can Qwest revisit its position on not including Regulatory mandated CLECs in the Prioritization Process? opt to meet the timeline for compliance.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 Dec-10-11 TBD	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments. To be re-addressed at the next session.
168	Issue	Nov 1 Meeting	Prioritization for Industry Guideline Change	Will Qwest change its position to allow Industry Guideline changes to be prioritized through the Prioritization Process. If so, provide language to include Industry Prioritization changes as part of the language: Qwest needs to be able to meet timelines where dates are mandated at industry bodies.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 Dec-10-11 TBD	Discussion held on 11/13, but Qwest needs more time to consider CLECs comments. To be re-addressed at the next session.
169	Issue	Nov 1 Meeting	Regulatory Type of Changes	Qwest proposes to re-visit Regulatory type of change to address performance measure obligations.	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 Dec-10-11 TBD	Discussion held on 11/13, but Qwest needs more time to consider CLECs definition. Qwest to provide position after considering CLECs comments at the next session.
170	Issue	Nov 1 Meeting	CLEC-Initiated PID Change	Will Qwest consider: <ul style="list-style-type: none"> a performance improvement or PIDs subject to the PAP as a Regulatory change? a CLEC-initiated performance improvement change not subject to PAP as a Regulatory change? 	Qwest— Judy Schultz	Nov-13 Extended Nov-27-29 TBD	12/12; Including closed CMP CR 5582099/AI 121201-2.

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
172	Issue	Nov 1 Meeting	Roles and Respons.	Review "Managing of CMP" proposal to include overall responsibilities; e.g., Qwest issues prioritization list and CLECs prioritize.	Core Team	TBD	11/20: See Qwest Proposed Managing the CMP Language – Revised 11-20-01 Qwest is prepared to discuss and close this Action Item.
173	Issue	Nov 1 Meeting	Voting Process	Develop the Voting Process.	Core Team	TBD	
174	Action	Nov 1 Meeting	Prioritization Documents	Attach the latest Ranking Form, sample of a Release Candidate List and compilation/tabulation form to the Prioritization section of the master redline.	Qwest— Mark Routh	Nov 13 Extended Nov 27-29 TBD	See Qwest Proposed Prioritization Language – Revise 12-01-01, Appendices A, B, and C Qwest is prepared to discuss and close this Action Item.
177	Action	Nov 13 Meeting	CMP Implem.	Draft a proposal for a formal implementation of the interim and final changes discussed within the CMP Re-Design to be discussed during the monthly CMP meetings.	Qwest— Judy Schultz	Nov 27-29 TBD	Related to #178
178	Action	Nov 13 Meeting	CMP Implem	Clarify what has been agreed upon for the implementation of an interim process.	Core Team	Nov 27-29 TBD	Related to #177
179	Action	Nov 13 Meeting	Product/ Process Interim CMP	What is CLEC impacting?	Core team	Nov 27-29 TBD	Refer to action #110
180	Action	Nov 13 Meeting	Product/ Process Interim CMP process	What is covered under the interim process for Product/Process (i.e., Additional Testing) in terms of Qwest initiated and Regulatory changes	Qwest— Judy Schultz	Nov 27-29 TBD	

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
181	Issue	Nov 13 Meeting	OSS CR Prioritization Regulatory Changes	Qwest to revisit language for the definition of a Regulatory change, and the proposed prioritization process as it relates to these. Qwest asks CLECs to draft proposed language for Regulatory Changes as it is written in the Red lined document to include PID/PAP scenarios. 11/13: Qwest to consider the position of CLECs on the need to prioritize Regulatory CRs and provide its final position at the next session.	Qwest	Nov 27-29 Dec 10-11 TBD	Prioritize all (excludes production support), provide for agreed upon mandatory/industry dates, allow exception, escalation and dispute resolution procedures to be invoked as necessary. (CLEC request) CLECs agree with language for regulatory changes as it is written in the red lined document Prioritization section has to include criteria around how to rank CRs.
182	Action	Nov 13 Meeting	Terms	Define migration testing and new release testing (Initial Implementation Testing), and Regression Testing, Controlled Production Testing, Interoperability Testing, SATE in the "terms" section of the red lined document.	Qwest— Jeff Thompson	TBD	11/30: See Qwest Proposed TERMS Language - 11-30-01 Qwest is prepared to discuss and close this Action Item. See #246
184	Action	Nov 13 Meeting	Issues/Action Items Log	Clarify issues and action items to better capture what the item is. Discussion that does not flush out sufficient detail should be confirmed in the appropriate meeting minutes	Core Team	Nov 27-29 Dec 10-11 On-going	Began reviewing Issues/Action Items Log for understanding and status. Will continue at next session.
187	Issue	Nov 27 Meeting	AT&T issues list	#9 from AT&T issues list (including differences due to geography and systems). 12/11 #9a from AT&T issues: define the requirements for establishing a	Qwest— Judy Schultz	Dec 10-11 TBD	01/14: OSS Interfaces do not have any geographical differences, however, there are functional differences that vary by geographic location, like USOCs.

**CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				point of contact for CMP related issues that are not followed within Qwest. (CMP help desk?)			
195	Action	Nov 28 Meeting	Post 10.0 PID/PAP CRs	Provide the CRs (information) for PID/PAP changes for which Qwest would want an exception to the CMP prioritization process. 12-11-01 Included what the system changes will be and how it will provide the performance improvement.	Qwest- Teresa Jacobs	Dec 10-11 TBD	The following 10.0 candidates have been defined: CR #30623 On-time jeopardy notification improvements CR #25379 Enhancement to accept and format orders for LSR rehosts with ACT=T for Unbundled Loop. CR #25381 Reject requests for conversion from Remote Call Forward for UBL
196	Action	Nov 28 Meeting	Prioritization	Provide a decision on whether to provide copies of documentation regarding prioritization and sizing.	Qwest- Teresa Jacobs	Dec 10-11 TBD	Qwest is prepared to discuss and close this Action Item. 11/28: The CLECs can refer to the "CMP CR Work Flow for OSS Interfaces" document on the CMP Redesign web site (language already incorporated into the Master Redlined framework in narrative format) for an overview of the processes used for releases. 01/14: The CMP Process addresses how work will be prioritized and Qwest, per the Master Redline, will provide sizing for

CLEC-Qwest Change Management Re-design Working Sessions
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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							each candidate. Qwest is prepared to discuss and close this Action Item.
197	Action	Nov 28 Meeting	Prioritization	Provide the end-to-end development life cycle and time interval for each milestone for systems and Product & Process CRs. 12-11-10 Provide best case scenarios for stand alone product & process, systems; most likely scenarios for systems and factors that could contribute to longer implementation time frames for Product & Process. Address the process, if any, for declining a CR for reason such as scope. (Within first 2 business days after receiving the CR)	Qwest—Teresa Jacobs Judy Schultz	TBD	11/28: The "TMA Release Timeline/Milestone" will be available by the next redesign session. This timeline will provide an overview of Qwest's development cycle for further discussion on Prioritization. 01/22: Timeline was presented at CMP Redesign. Qwest is prepared to discuss and close this Action Item.
206	Action	Dec 10 Meeting	Notification	To insure appropriate Qwest personnel to receive the same event notifications in the same time frames as CLECs	Qwest—Judy Schultz	TBD	
212	Action	Dec 11 Meeting	CR Initiation	Review AT&T proposal (and draft language) that: For regulatory or industry change CRs, originator of CR must provide specific information in the CR identifying what makes the CR a regulatory change or industry guideline change. Such information must include specific references to regulatory or court orders, legislation, industry guidelines as well as dates,	Qwest—Andy Crain	TBD	01/28: This Action Item is addressed in the document which captures Qwest's understanding of the CLEC prioritization proposal. Qwest is prepared to discuss and close this Action Item.

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
				docket or case number, page numbers and the mandatory implementation date, if any.			
213	Action	Dec 11 Meeting	CR Initiation Type of Change	Need a process to debate whether a change fits as a regulatory or industry guideline change. With the information in 3a., CLECs will be informed to have this debate (ATT Issues List).	Core Team	TBD	
214	Action	Dec 11 Meeting	CR Initiation Level of Effort	Review the CR initiation process to insure that the description of the output of each step of the process is clearly defined; i.e., LOE (in range of hours) and affinity	Qwest— Andy Crain /Core Team	TBD	
215	Action	Dec 11 Meeting	Exception Process	Develop proposed language for exception process for the core team to review.	Qwest— Judy Schultz	TBD	Related to #93
216	Action	Dec 11 Meeting	Issue Management	Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it.	Qwest— Judy Schultz	TBD	
217	Action	Dec 11 Meeting	Addendum Documentation and Software	Qwest to develop language regarding addenda to release software and documentation. How is it done? How is it communicated? How is it documented? Are CLECs ever consulted?	Qwest— Jeff Thompson	TBD	01/28: Following is a high level overview of the current disclosure, release and addendum process: <ul style="list-style-type: none"> Draft Developer Worksheets -- 45 days prior to a release the draft Developer Worksheets are made available to the CLEC's. Final Disclosure -- 5 weeks prior to a release the Final Disclosure documents, including I charts and

CLEC-Qwest Change Management Re-design Working Sessions **Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							<p>developer worksheets are made available to the CLECs.</p> <ul style="list-style-type: none"> • Release Day – On release day only those CLECs using the IMA GUI are required to cut over to the new release. • 1st Addendum – 2 weeks after the release the 1st addendum is sent to the CLECs. • Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the release as needed. There is no current process and timeline. • EDI CLECs – 6 months after the release those CLECs using EDI are required to cut over to the new release. CLECs are not required to support all new releases. <p>Qwest is prepared to discuss and close this Action Item.</p>
218	Issue	Dec 11 Meeting	Qwest Initiated Product/Process CR	Revisit Qwest initiated Product/Process change process. There is an issue around its use after redesign is complete. There are issues around what is "CLEC-affecting". Do CLECs get to vote on "CLEC-impacting" changes?	Core team	TBD	<p>12/12: Including closed CMP CR number PC112901-01/AI 121201-4 (CR not directly related to a TI or a 271 workshop ruling)</p> <p>01/28: See <u>Qwest Proposed Product/Process Change Request Initiation Process</u></p>

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Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							Qwest is prepared to discuss and close this Action Item.
219	Issue	Dec 11 Meeting	Implementation of Interim Process for Product/Process	Implementation of interim processes. Qwest should come back to the Core Team at redesign meetings with questions/concerns about implementing what is agreed to in redesign. This will insure that the implementation meets both groups' expectations, resolve ambiguities and enable (and may drive) clarification of the redesigned process in the Master Redline [this should be a standing agenda item].	Core team	Ongoing	Related to #222
221	Action	Dec 11 Meeting	PID and PAP Changes Post-271	Send Qwest proposal for PID and PAP changes post 271 approval (9 state filing).	Qwest— Andy Crain	Dec-24 TBD	
222	Action	Dec 11 Meeting	Implementation of Process for Product/Process	Provide timeline to implement the interim product & process change process.	Qwest— Judy Schultz	Dec-24 TBD	Email to redesign team. Related #219
223	Action	Dec 11 Meeting	CR Timelines	Develop timelines to illustrate CR process and present Qwest's compliance with these at the CMP Meeting.	Qwest— Judy Schultz	Jan 17	Qwest is prepared to discuss and close this Action Item.
224	Action	Dec 11 Meeting	Similar CRs	Qwest to develop language to address how the CMP will handle similar CRs and a housekeeping method for old CRs.	Qwest— Judy Schultz	TBD	01/10: CMP database cross- references similar CRs. Closed CRs will be archived and posted to the CR Archive page.

CLEC-Qwest Change Management Re-design Working Sessions **Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
							http://www.qwest.com/wholesale/cmp/archive.html
225	Action	Jan 22 Meeting	Tiers of Notification – Product/ Process	Visit web site for recent notification and identify examples for Tier I and II from the Tiers of notification. Include the comment and holding tank process for the different Tiers.	Core Team	TBD	Qwest is prepared to discuss and close this Action Item.
226	Action	Jan 22 Meeting	Status of Implementation during Escalation or Dispute	What is the status of a change when the escalation or dispute resolution is invoked?	Qwest— Andy Crain	TBD	Determine one of the options: - Qwest moves forward with the implementation - Hold (stay) - Delay
227	Action	Jan 22 Meeting	SGAT Language	Clarify SGAT language on CMP in sections 2.3.1 and 12.2.6, in addition, add language that states that CMP will not supersede an ICA.	Qwest— Andy Crain	TBD	01/29: Activities in CMP shall not be construed to override or amend the interconnection agreement between Qwest and any CLEC. Qwest is prepared to discuss and close this Action Item.
229	Action	Jan 22 Meeting	Job Aid— Documentation	Create job aid for documentation review; e.g., Holding tank vs. operational version	Qwest— Judy Schultz	TBD	
230	Action	Jan 22 Meeting	Role of CMP Group for Tech Pub and PCAT	What is the role of the CMP group (monthly) in the Tech Pub and PCAT proposed changes in the non-interim term?	Qwest— Judy Schultz	TBD	
231	Action	Jan 22	CMP	Judy Schultz to add clarity to	Qwest—	TBD	Mitch Menezes/ATT to provide input

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—OPEN**

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Improvements Matrix	improvements matrix presented to the Re-Design team on 1-22	Judy Schultz		to Judy Schultz
232	Action	Jan 23 Meeting	Prioritization— Industry Guidelines	Develop language to address the industry guideline prioritization (above the line and below the line)	Qwest— Judy Schultz/ Teresa Jacobs	TBD	01/28: This Action Item is addressed in the document which captures Qwest's understanding of the CLEC prioritization proposal. Qwest is prepared to discuss and close this Action Item.
233	Action	Jan 24 Meeting	Impasse Issue— Prioritization	Identify the concept of the Prioritization Process. Upon agreement, Qwest to provide draft language of the Prioritization Process to the CLECs for comments	Qwest— Beth Woodcock	Jan 30	1/30: Shared with Redesign Core Team 2/6-7: Proposed language reviewed and discussed at Redesign session.
234	Action	Jan 24 Meeting	Qwest Initiated Process Change	Draft the potential impasse issue on the request for a Stay during the product & process implementation period	Qwest— Beth Woodcock	Jan 30	Share with Redesign Core Team
237	Action	Feb 5 Meeting	Product/ Process	Develop language for "STAY" and parameters for 3 rd party arbitrator	Qwest— Andy Crain	Feb 19	
238	Action	Feb 5 Meeting	Documentation	Review Documentation "Holding Tank"	Qwest— Kessler	Feb 19	
239	Action	Feb 5 Meeting	Product Process CR initiation	Develop language around how to move items from level 3 to level 4	Qwest— Andy Crain	Feb 19	
240	Action	Feb 6 Meeting	Test Environment	Add language to CR initiation process for CRs (adding products) to the test environments	Qwest— Jeff Thompson	TBD	
242	Action	Feb 6 Meeting	Escalation Process for	Determine how CLECs will provide contact lists for escalations	Core Team	Feb 19	

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#	Issue/ Action	Date Originated	Category	Description	Owner	Due Date	Resolution/Remarks
			Tech Issues				
243	Action	Feb 7 Meeting	Prioritization – Regulatory Change	Qwest to propose language on the criteria used to determine method of implementing regulatory changes	Qwest— Judy Schultz	Feb 19	
244	Action	Feb 7 Meeting	SCRIP	CLECs to send written comments in advance to Jim Maher	Core Team	Feb 14	
245	Action	Feb 7 Meeting	Terms	Review all proposed Terms language and provide comments to Jim Maher	Core Team	Feb 14	Related to #106, 133, 141, 162, 182, 250
246	Action	Feb 7 Meeting	CICMP Docs	Archive the old CICMP document and post the current “accepted” CMP doc. Add a link to Direct to CICMP Process document, if necessary	Qwest— Judy Schultz	Feb. 8	Posted on CMP website
247	Action	Feb 7 Meeting	Red Line Document	Put “Clean” copy of the current Red Line doc on the web with clarification statement	Qwest— Judy Schultz	Feb. 8	Posted on CMP website
248	Action	Feb 7 Meeting	Terms	Define ‘eligible change request’	Core Team	Feb 14	Related to #246

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

CLOSED ISSUES and ACTION ITEMS (items in BLUE were closed at the last working session)

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
1A	Issue	July 11 Meeting	3 rd Party Provider Role	<p>What role do 3rd Party Providers play in this re-design effort?</p> <p>a) 3rd Party Providers are part of the core team to re-design the process, however no 'voting' rights on behalf of themselves or the CLEC-client [Process=Yes, Vote=No]</p> <p>b) 3rd Party Providers are allowed to 'voice' and 'vote' as any CLEC in this re-design effort [Process and Vote=Yes]</p> <p>c) 3rd Party Providers are excluded from the core team [Process and Vote=No]</p> <p>d) 3rd Party Providers are part of the core team to re-design the process, however no 'voting' rights on behalf of themselves, but can vote on behalf of the CLEC client with an LOA [Process=Yes, and Vote=Yes for CLEC client, Vote = No for themselves]</p>	Core Team	CLOSED July 19	<p>DECISION:</p> <p>d) 3rd Party Providers are part of the core team to re-design the process; however no 'voting' rights on behalf of themselves, but can vote on behalf of the CLEC client if a Letter of Authorization is in effect. The LOA must be provided to Judy Schultz.</p>
1B	Action	July 11 Meeting	3 rd Party Provider	Core Team to conclude discussion and participants to decide on one of the above scenarios	Core Team	CLOSED July 19	COMPLETED in July 19 meeting.
1C	Issue	July 19 Meeting	Voting	Can a CLEC represent another CLEC on Voting for CMP re-design process?	Core Team	CLOSED July 19	<p>DECISION:</p> <p>Yes, if a Letter of Authorization is</p>

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							in place for a specific session and on specific issues. The LOA must be provided to Judy Schultz.
1D	Issue	July 19 Meeting	Voting	If a CLEC or core team member is absent, how do we handle the vote?	Core Team	CLOSED July 19	DECISION: It is a CLEC's responsibility to have a same CLEC backup, or a LOA in place with an alternate.
1E	Action	July 19 Meeting	Voting	Create a standard voting form	Qwest -- Mark Routh	CLOSED August 7	COMPLETED: Voting form created and will be included in the draft meeting minutes for 8/7-8/8 session
1F	Action	July 19 Meeting	LOA	Create a standard for LOA for topic, meeting, and date to be used during the re-design sessions.	Qwest - Judy Schultz	CLOSED August 7	COMPLETED: LOA presented, discussed and agreed upon during the 8/7 Meeting.
1G	Action	July 19 Meeting	Voting	Define rules for a quorum when a 'vote' is required	Core Team	CLOSED August 7	DECISION: - Quorum is defined as 51% of the present Core Team Members - Majority vote by present Core Team Members carries the decision
1H	Action	July 19 Meeting	Voting	Seek written permission from July 19 participants if 3 rd Party Provider voting results can be posted on the web site as part of the FINAL meeting notes.	Qwest-- Mark Routh	CLOSED August 16	Participating CLECs (SBC Telecom not available) provided permission for Qwest to include voting results as part of the FINAL 7/19 Meeting Minutes COMPLETED: SBC Telecom gives permission to

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log--CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
2	Action	July 11 Meeting	Baseline Document	Create a single document that inserts CLEC comments on areas for improvement in Qwest's CMP into the appropriate sections of the OBF 2233 version 2 framework	Judy Lee	CLOSED July 19	publish its 7/19 voting result. COMPLETED: A tool for the working session is posted on the web site
3	Action	July 11 Meeting	Agenda Items	Schedule agenda items/elements for future working sessions	Core Team	CLOSED July 19	COMPLETED: See schedule of working sessions on the web site
4	Action	July 11 Meeting	Working Session Location	Decide the location for September working sessions	Core Team	CLOSED July 19	COMPLETED: All sessions will be hosted by Qwest and held in Denver, CO
5	Action	July 11 Meeting	CMP Redesign Web Site	Enhance the CMP web site to include the CMP Redesign information	Qwest— Mark Routh	CLOSED July 19	COMPLETED: See CMP web site for "CMP Redesign"
6	Issue	July 19 Meeting	CMP Redesign Material	What is the process to share CMP redesign material with the CLEC community?	Qwest— Judy Schultz	CLOSED July 19	COMPLETED: Draft minutes and material will be shared with the core team participants for input. Afterwards, Qwest will finalize the minutes and post on the web site. CLECs will be notified about the posting. DECISION: Participants decided that Qwest should issue a notice referring CLECs to the web site for meeting minutes, handouts and agenda for next meeting. The handouts will not be attached to the notice.
7A	Action	July 11	Post CLEC	CLEC requested that Qwest post all	Qwest—	CLOSED	COMPLETED:

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Comments on Web Site	CLEC comments on the CMP Re-design web site.	Mark Routh	July 19	Matrix is posted on the web site
7B	Action	July 11 Meeting	Written Permission to Post CLEC Comments	Seek clearance in writing from individual CLECs to post their comments on the CMP Redesign web site.	Qwest—Mark Routh	CLOSED July 13	COMPLETED: CLECs that provided comments allowed Qwest to post on web site
8	Action	July 19 Meeting	Notice and Distribution Lists	Provide guidelines for CLEC notifications and distribution list - Ease-of-use - Comment/Reply process including web site option to comment - Contact information - Identify limitations on contact information: proprietary, open-to-participant, or open-to-all	Core Team	CLOSED August 7	COMPLETED: Established four categories for notices to facilitate notification efficiency.
9	Action	July 19 Meeting	Re-name	Do we need to rename CMP to CMP to CMP? Rename co-provider to CLEC?	Core Team	CLOSED August 16	DECISION (7/19): Qwest will rename co-provider to CLEC and provider to Qwest. DECISION (8/7): Recommendation to rename from CMP to CMP will be presented at 8/15 CMP Meeting DECISION: (8/15) CLECs agreed to change CMP to CMP
10	Action	July 19 Meeting	ATIS	Research what ASOG activities are being worked on at ATIS.	Qwest—Judy Schultz	CLOSED August 7	COMPLETED: ATIS is not developing a Change Management process that includes ASRs. Related to Issue #17B.
11A	Action	July 19 Meeting	CMP Meeting Distribution	Determine what to include in the CMP meeting distribution packages.	Core Team	CLOSED August 8	COMPLETED: REDLINED CMP re-design

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
			Package				framework will reflect results of discussion.
11B	Action	August 8 Meeting	CMP Meeting Distribution Package	Qwest to provide a sample of the "report" containing information for CMP meeting.	Qwest— Judy Schultz	CLOSED August 14	COMPLETED: Judy Schultz presented example report and CLECs accepted the 'report' concept.
11C	Action	August 8 Meeting	CMP Meeting Distribution Package	CLECs have a need to see one document/report containing all information (single point of reference). For example, CR/RN Logs need to include originator, title, description, history and status, so that individual CRs and RNs do not need to be included in Monthly Meeting package. CRs also need to include actual response/s and decision. Present a sample distribution package for review with updated tracking documents	Qwest— Judy Schultz	CLOSED Sep 5	DECISION: Rollout to CLEC community at the 9/19 Monthly CMP meeting. COMPLETED: Qwest presented mockup at the 9/5 re-design meeting.
12	Action	July 19 Meeting	Walk-On Agenda Items	Add walk-on item to the end of each CMP meeting agenda.	Qwest— Mark Routh, Matt Rossi	CLOSED July 19	DECISION: Qwest will add walk-on items to the end of each agenda, as appropriate, starting with the August 15 meeting
13A	Action	July 19 Meeting	CMP Web Site	Review CMP web-site and suggest potential changes and guidelines	Core team	CLOSED August 7	COMPLETED: Included in 8/8 redlined CMP framework
13B	Action	August 7 Meeting	CMP Web Site	Can Qwest display new naming convention on the CMP web site (CRs and RNs)—e.g., Ability to click category and receive next sub category?	Qwest – Judy Schultz/ Core Team	CLOSED August 14	COMPLETED: Closed on proposals for sub-category under the 4 categories (Systems, Product, Process and Network). Qwest is able to display naming convention on web site

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
13C	Action	August 7 Meeting	CMP Web Site	Provide location (link) where all notification documents are kept – Wholesale web site	Qwest – Judy Schultz	CLOSED Sep 20	COMPLETED: Jarby Blackmun shared proposed screen shots with Core Team on 9/5. Related to Items #13F, 37, 44, and 61.
13D	Action	August 7 Meeting	CMP Web Site	Add English title to all new and existing CRs posted on the CMP web site	Qwest – Mark Routh Matt Rossi	CLOSED Sep 5	COMPLETED: Matt and Mark have updated the web sites to add the requested information.
13E	Action	August 8 Meeting	CMP Web Site	Qwest to determine how to time-stamp each web site page (whenever the page is updated on the web site)	Qwest—Judy Schultz	CLOSED August 14	COMPLETED: Qwest is currently doing this today and will continue on all updated pages
13F	Action	August 8 Meeting	CMP Web Site	Develop timeframe to roll-out web site and mail-out process	Qwest – Judy Schultz	CLOSED Sep 20	Per Jarby Blackmun, Qwest is targeting early November to deploy modifications to CMP web site.
14A	Action	July 19 Meeting	Notification Process	Discuss guidelines for the notification process at the next session.	Qwest—Judy Schultz	CLOSED August 7	Refer to re-worded Action #14C.
14B	Action	August 7 Meeting	Notification Process	Explore functionality and capability of the “mail out” tool used for Product/Process notifications.	Qwest – Judy Schultz	CLOSED August 8	COMPLETED: “Mail-outs” are not on the web site—pending closure on the categories and sub-categories from Core Team (see Item #13B)
14C	Action	Updated August 7 Meeting (7/19)	Notification Process	Using proposed naming convention, build a matrix of possible combinations for RN titles.	Qwest – Judy Schultz	CLOSED August 14	COMPLETED: CLECs provided upgrades to Judy Schultz’ proposal. As a result of this discussion, opened Item #14D
14D	Action	August 7 Meeting	Notification Process	Take existing system, product and process notification and modify to match proposed naming convention to obtain	Qwest – Judy Schultz	CLOSED Sep 5	DECISION: Qwest will adopt a single naming convention for notifications.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				one single naming convention for all notifications			Progress will be monitor at the Monthly CMP meetings.
14E	Issue	August 8 Meeting	Notification Process	What category (i.e., 4 category) should be used to notify CLECs of the introduction of a new product? Should Qwest send one notice addressing product and process, or two separate, but redundant notices (i.e., one for Product and another for Process but with the same content)?	Core Team	CLOSED August 8	DECISION: Qwest to send a Product notice and a separate Process notice with the same content information—redundant notices with different category and name on the subject line.
14F	Action	August 8 Meeting	Notification Process	Provide proposals for sub-categories (e.g., Product Family) under each notice category (Systems, Product, Process and Network) and links.	Qwest—Judy Schultz	CLOSED August 14	COMPLETED: Web Site modification rollout is dependent on proposal for sub-categories—see Item 14C. Presented and closed during 8/14 Re-Design meeting
16	Action	July 19 Meeting	Qwest Comments on MATRIX	Include Qwest comments on the MATRIX (OBF Issue 2233 with CLEC Comments)	Qwest—Judy Schultz	CLOSED August 14	COMPLETED: Included Qwest's proposal on the MATRIX.
15	Action	July 19 Meeting	Notice	Research source and readability of event notifications (software applications)	Qwest—Mark Routh	CLOSED August 7	COMPLETED: System outages and event notifications are now being released in a "doc" format.
17A	Issue	July 19 Meeting	Scope	Qwest expressed concern that the Scope needs further clarification. Qwest will propose language to re-visit the Scope at a future session.	Qwest—Judy Schultz	CLOSED Oct 2	COMPLETED: Element revisited on Sep 18 and 20 with action taken by Core Team and Qwest to further discuss on Oct 2 and 3.
17B	Issue	August 7 Meeting	Scope	Describe Qwest's position for systems and functionality supported in the current CMP process (i.e., EXACT,	Qwest—Judy Schultz	CLOSED Sep 5	COMPLETED: August 14 discussion provided a definition for OSS Interfaces that

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				HEET)			includes system functionality.
17C	Action	August 7 Meeting	Scope	Dialogue on introduction and scope to seek input from CLECs to prepare for Qwest's proposal on September 20 th	Qwest – Judy Schultz	CLOSED Sep 5	DECISION: Qwest will provide proposal on Sep 20 for discussion.
18	Action	July 19 Meeting	PIDs	WorldCom will provide the Core Team members with the latest PIDs for Change Management.	WorldCom Liz Balvin	CLOSED August 7	COMPLETED: Liz Balvin sent PIDs on July 20 th
19	Issue	July 19 Meeting	Contact Information	Eschelon requested that contact information for all participant be included on the CMP Re-design web site	Qwest— Judy Schultz	CLOSED August 7	Request from review of 7/19 DRAFT meeting notes and material COMPLETED: All contact information now included on the Re-Design page on the CMP web site
20	Action	July 19 Meeting	Discussion Items under Issues/ Action Item Log	Eschelon requests to include on the agenda topics for discussion under Issues and Action Items Log	Qwest— Judy Schultz	CLOSED August 7	Request from review of 7/19 DRAFT meeting notes and material COMPLETED: Updated 8/7-8/8 agenda
21A	Action	August 7 Meeting	Core Team	Establishing CMP Re-Design Core Team Membership	Qwest – Judy Schultz	CLOSED August 7	COMPLETED: Reviewed Core Team membership
21B	Action	August 7 Meeting	Core Team— Meeting Quorum	Establish Core Team Quorum at the beginning of each working session	Qwest – Judy Schultz	CLOSED August 7	DECISION: Quorum determination will be added to the agenda and be determined by attendance at each working session
22	Issue	August 7 Meeting	Core Team— Expectations	Define Expectations of Core Team Membership	Core Team	CLOSED August 7	DECISION: Core Team Expectations/ Responsibilities: - Dedicated resource to negotiate a

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							<p>new CMP process.</p> <ul style="list-style-type: none"> - Core Team Members can be added at any time understanding the roles and responsibilities of a Core Team Member. - Core Team Members must commit to participate either in person, via conference call, or by LOA in each working session. - Core Team Membership will be revoked if 3 consecutive working sessions are missed. - Core Team member will not be allowed to vote on any issue in which they did not participate.
23	Action	August 7 Meeting	Upcoming Event Calendar	Provide an "up coming" events page on the CMP web site that includes all monthly meetings, re-design meetings and any other interim ad hoc meetings/calls	Qwest – Mark Routh, Matt Rossi	CLOSED Sep 5	<p>COMPLETED: Calendar is on the web site.</p>
24	Action	August 8 Meeting	CMP POC List	Establish a CMP POC list (primary and alternate POC) and post on web site	Qwest—Judy Schultz	CLOSED Oct 16	<p>Response is quite slow from the CLEC community, therefore Qwest is calling and asking CLECs to respond with contact information. In addition, Qwest to publicize the need for POC information at the Qwest sponsored CLEC Forums. 10/3:Per Jim Maher—90% complete—will go on web</p> <p>COMPLETED: 10/16 – on the CMP web site as CR</p>

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Manager POC, Team Representative and Alternate Contact
25	Issue	August 8 Meeting	Quick Hit Fix	How should Qwest introduce some Change Management Process changes ahead of completing the re-design CMP effort?	Core Team	CLOSED August 8	DECISION: Qwest will review any proposals with the CMP re-design Core Team members before communicating at a Monthly CMP Meeting. During the Monthly CMP Meeting, Qwest will let meeting attendees know who participated in designing the Quick Hit proposal. “Quick Hit Fix” will be a standing item for the Monthly CMP Meeting agenda.
26	Action	August 8 Meeting	Meeting Minutes Review	What is the timeline for DRAFT and FINAL 8/7-8/8 Meeting Minutes and material?	Qwest— Judy Schultz	CLOSED August 8	DECISION: – DRAFT Meeting Minutes and materials (by Fri, 8/10 9am MT) – Distribute DRAFT to 8/7-8/8 re-design session participants for review (by Fri, 8/10 Noon MT) – Participants provide Matt Rossi with corrections/additions (Mon, 8/13 Noon MT) – FINAL Meeting Minutes and materials to be distributed and posted on CMP Re-design web site (by Tuesday, 8/14)
27	Action	August 8 Meeting	CMP Re-design Location	Determine location for the October, November and December re-design working session.	Core Team	CLOSED August 16	Qwest has tentatively reserved meeting rooms in Denver, Colorado

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log---CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							DECISION: (8/16) October sessions will be held in Minneapolis, except for CMP week; November and December sessions will be held in Denver
28	Action	August 8 Meeting	Monthly CMP Meeting	Move December meeting to 12/12	Qwest— Mark Routh, Matt Rossi	CLOSED August 16	COMPLETED: Monthly CMP meeting is moved to 12/12.
29	Action	August 8 Meeting	Exception Process	Share other ILEC Exception Process with 8/14 working session participants to be used as a base.	Sprint— Sandy Evans	CLOSED August 14	COMPLETED: Sprint and AT&T brought samples.
30	Action	August 14 Meeting	CMP Web Site	Add Meeting Agenda, material, dates to web site CMP category	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Began with August 14 and 16 meeting minutes
31	Action	August 14 Meeting	CMP Web Site	Change category Ordering to Repair/Provisioning and Repair to Repair/Maintenance	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
32	Action	August 14 Meeting	CMP Web Site	Add Raw Loop Data Tool to the IMA GUI section of web site categories for Systems	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
33	Action	August 14 Meeting	CMP Web Site	Add another sub-category of "Other" for systems with possible expansion later after re-visit of the scope discussion.	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
34	Action	August 14 Meeting	CMP Web Site	Investigate adding back end systems to the sub categories of the Systems notifications on the web site (WFA, TIRKS, etc)	Qwest— Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
35	Action	August 14 Meeting	CMP Web Site	Add "procedures" as a sub category (2) to the Process section	Qwest— Judy	CLOSED Sep 5	COMPLETED: This is to include any joint

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
					Schultz		procedures that involve both the CLEC and Qwest – e.g., repair and exchange of CLEC owned equipment
36	Action	August 14 Meeting	CMP Web Site	Add "Tariffs" as a main category in the proposed matrix	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
37	Action	August 14 Meeting	CMP Web Site	Investigate the possibility of housing all RNs, CRs and Training information in one location and providing multiple methods in which this information is accessed on the web site. Example, this can be a search by number or search by category	Qwest – Judy Schultz	CLOSED Sep 20	COMPLETED: Jarby Blackmun provided overview on CMP web site with search capabilities. Demo is available for CLECs on CMP web site.
38	Issue	August 14 Meeting	Notifications	Identify designated owner or point of contact for the mail outs to contact with problems – example web sites listed with in-active URLs. 9/5: Is there flexibility in the process to support CLECs on notices (e.g., Help Desk, Sales Manager)?	Qwest – Judy Schultz	CLOSED Oct 2 (Extended to Oct 17 regular CMP)	Qwest will continue to refer a CLEC to their respective Service Manager if there are questions pertaining to a notification. 9/5: CLECs need to work with their respective Service Manager, and if necessary, speak with the Service Manager's boss to clarify questions pertaining to a specific notice. 9/18: Toni Dubuque will join Oct 3 session to discuss DECISION: Toni Dubuque to discuss this issue with the CLECs at the Oct 17 CMP Product/Process Meeting.
39	Issue	August 14 Meeting	CMP Web Site	Provide screen shots of the web site to give visual representation	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: See Jarby Blackmun's Qwest Wholesale CLEC "Notices On-

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Line" presentation, dated Sep 4, 2001 on the CMP Re-design web site.
41	Action	August 14 Meeting	CMP Web Site	Add the Re-Design page on the CMP section of the Proposed Release Notification matrix	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Revised Naming Convention matrix.
42	Action	August 14 Meeting	Notification	Investigate how notifications are done for Network outages, including a paging broadcast capability. 9/5: Does the SGAT language pertaining to method of notification for Network outages need to be revised based on Qwest practice?	Qwest – Jim Maher Andy Crain	CLOSED Feb 5	Related to Item #66 Beth Woodcock to contact Andy Crain to provide information at the Oct-30-Nov-1-next session. 11/29: Andy Crain to clarify at next session. Jim Maher to confirm paging process for Network Outages. 01/08/02: Jim Maher – Current notification is via email as denoted in the SGAT. 01/24: Jim Maher to check the CLEC questionnaire to see if the paging option is still on it. 01/28: There is no reference to paging in the CLEC questionnaire.
43	Action	August 14 Meeting	CMP Web Site	Investigate possibilities for displaying (posting) and sorting Sub-category 3 of the web site	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Jarby Blackmun informed the team that search capabilities will include category, sub-category and document number.
44	Action	August 14 Meeting	Notification	Create instructions for access to web site notification	Qwest – Judy Schultz	CLOSED Sep 20	DECISION: Per Core Team, not required due to simplicity of using the modified CMP web site.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
45	Action	August 14 Meeting	Voting Tally Form	Incorporate Qwest's position on the Voting Tally Form	Qwest – Judy Schultz	CLOSED August 16	COMPLETED: See Procedures for A Vote and Impasse Resolution Process (includes Voting Tally Form) on the CMP Re-design web site
46	Action	August 14 Meeting	Voting	Draft a proposal for a voting procedure and contingency dispute resolution process for dead-lock	Judy Lee	CLOSED August 16	COMPLETED: See proposed Procedures for A Vote and Impasse Resolution Process (includes Voting Tally Form) on the CMP Re-design web site
48	Action	August 14 Meeting	Voting	Determine how to reach resolution within the CLEC community if impasse were to occur – present draft proposal	AT&T - Terry Bahner	CLOSED Sep 5	DECISION: CLECs will hold a conference call to achieve consensus to resolve an impasse issue.
49	Action	August 16 Meeting	Types of changes – OBF V.1	Look at other industry bodies that need to be included in type 3 changes (e.g., ANSI and ATIS)	Core Team	CLOSED Sep 20	COMPLETED: Types of Changes discussed on Sep 20.
50	Action	August 16 Meeting	Types of Changes – OBF V.1	Present change request flow chart, form, and procedures for CR handling	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Flow chart of change request process was discussed with modifications. Qwest to make modifications (add Denied, Escalated, Deferred and Withdrawn) and present flow chart to the CLEC community at the Sep 19 Monthly CMP meeting.
51	Action	August 16 Meeting	Types of Changes – OBF V.1 Terms	Obtain SGAT language for 'versioning' release language. 10/16: Define 'versioning'	Qwest – Judy Schultz	CLOSED Nov 29	Pull language on OSS versioning currently in SGAT. "Versioning" will be defined in the Terms session at a later date.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							DECISION: The word "versioning" has been omitted from the master redline language, therefore, a definition is no longer needed at this time.
52	Action	August 16 Meeting	OBF V. 1	Create language in OBF version 1 in Change to Existing Interfaces section VII. Also address 'defects.'	Qwest – Judy Schultz	CLOSED Oct 30	COMPLETED: Discussion on Change to Existing Interface completed. "Defects" will be addressed during discussion on Production Support. See Action #99 to capture this item.
53	Action	August 16 Meeting	Qwest CMP Process Document	Revise Qwest CMP process document to incorporate added language and proposed changes/improvements to the overall process to provide a basis for comparison and discussion with the CMP Re-Design Core Team.	Qwest – Judy Schultz	CLOSED Nov 29	Qwest to use redlined CMP format for its proposed language 11/29: Closed, this is the ongoing effort of the CMP redesign team.
54	Action	August 14 Meeting	Meeting Minutes	Add action item verbiage to the meeting minutes as opposed to referencing the action items document	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: Began with the August 14 and 16 meeting minutes
55	Action	August 16 Meeting	Meeting Minutes Review	What is the timeline for DRAFT and FINAL 8/14 and 8/16 Meeting Minutes and material?	Qwest – Judy Schultz	CLOSED Sep 5	COMPLETED: – DRAFT Meeting Minutes and materials (by Tues , 8/21-Fri, 8/24) – Distribute DRAFT to 8/14 and 8/16 re-design participants for review (by Tues , 8/21 Fri, 8/24 COB) – Participants provide Mark Routh with corrections/additions

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							(Thurs, 8/23-Tues, 8/28 COB) - FINAL Meeting Minutes and materials to be distributed and posted on CMP Re-design web site (by Monday , 8/27 Fri, 8/31) Qwest extended timeline on 8/21.
56	Action	August 14 Meeting	Meeting Minutes Update	Revise August 7-8 Final Meeting Minutes to: - Change "CLEC" to "Co-Provider" in the word CMP on page 3, paragraph 4 - Correct name to "Wicks" - Correct Evans-Sprint comments to "responses to CRs are sent to the originator via email, not posted on the web site."	Qwest— Jim Maher	CLOSED Sep 5	COMPLETED: Refer to CMP Re-design web site for revised final meeting minutes.
57	Action	August 14 Meeting	Meeting Minutes Update	Revise July 19 Final Meeting Minutes to include the voting results on the 3 rd Party Provider issue—on August 14, the last voting CLEC has given Qwest permission to publish its result.	Judy Lee	CLOSED August 21	COMPLETED: Revised Final July 19 Meeting Minutes are posted on the CMP Re-design web site.
58	Action	August 14 Meeting	Core Team Expectations	Update the document to: "New Core Team member will not be allowed to reopen a vote on any issue that has been decided on."	Judy Lee	CLOSED August 16	COMPLETED: Revised guidelines are posted on the CMP Re-design web site.
59	Action	August 16 Meeting	OBFF August, 2001 Framework	Share with the re-design team the results of OBFF Issue 2233 subcommittee proposal—a2v2	Judy Lee	CLOSED August 21	COMPLETED: Sent via email to all re-design participants.
60	Action	Sep 5	CLEC Question-	Verify if there is an entry on the CLEC	Qwest —	CLOSED	Promote the importance for CLECs

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	naire	questionnaire for contact information (POC). Does the questionnaire need to include primary and secondary point-of-contact?	Matt Rossi	Oct 2 (Moved to general Oct 17 CMP)	to provide accurate contact information at the Qwest sponsored CLEC Forum. Primary and Secondary POC information is not entries in the questionnaire. DECISION: Address this issue at the October 17 CMP Product/Process meeting.
61	Action	Sep 5 Meeting	CMP Web Site	Provide an Archive on the CMP web site.	Qwest – Judy Schultz	CLOSED Sep 18	COMPLETED: Archive will remain on the CMP web site
62	Action	Sep 5 Meeting	Re-design Location	Provide location, directions and names of nearby hotels for Minneapolis meetings.	Qwest – Judy Schultz	CLOSED Sep 10	COMPLETED: Information provided to all CMP re-design participants
63	Action	Sep 5 Meeting	CMP Re-design	Provide examples at the Qwest sponsored Sep CLEC Forum of what has been changed as a result of the CMP re-design effort	Qwest – Judy Schultz	CLOSED Oct 2 (Extended to Oct 17 CMP)	The Qwest sponsored CLEC Forum on September 12-13 was postponed due to the national crisis. This needs to be scheduled around the CMP re-design and monthly CMP meetings. DECISION: Toni Debuque will address at Oct 17 CMP Product/Process meeting
64	Action	Sep 5 Meeting	Denied Change Request	Allegiance to re-introduce a previously denied CR that is still needed so that Qwest can assess and CLECs to prioritize.	Qwest – Mark Routh	CLOSED Sep 18	DECISION: Closed as an action item for the re-design effort, but tracked on the OSS Interface CMP action item list
65	Action	Sep 5 Meeting	Re-design Impasse Resolution Process	Obtain feedback from individual organizations on the draft proposed CLEC-Qwest Impasse Resolution	Core Team	CLOSED Sep 20	COMPLETED: See “CLEC-Qwest CMP Re-design Procedures for Voting and Impasse

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				Process for the re-design effort.			Resolution Process_09-20-2001" on CMP web site.
66	Action	Sep 6 Meeting	271 Workshop SGAT	Qwest to make presentation regarding the SGAT language and how it relates to the process structured by the Core Team.	Qwest – Andy Crain	CLOSED Oct 3	Including Item #42 Discussion held on Sep 18 and 20 with more discussion on Oct 2-3 (re-visit Scope) and prior to the November filing. COMPLETED: Qwest presented language with CLEC discussion on Oct 3
67	Issue	Sep 6 Meeting	271 Workshop SGAT	Do exhibits G (CMP framework) and H (escalation process) need to be in the SGAT?	Core Team	CLOSED Oct 3	Related to Item #66 Discussion held on Sep 18 and 20 with more discussion on Oct 2-3 DECISION: Qwest will include Exhibit G (formerly known as Exhibits G and H) in the SGAT – red lined as it evolves with the re-design
70	Issue	Sep 6 Meeting	CLEC Review of Tech Pubs and PCAT Changes	What is Qwest's proposal for CLECs to review and provide comments to notices on Tech Pub and PCAT changes – what is the role of the CMP group (monthly) in these proposed changes? 10/16: Issue remains open until the interim process is implemented.	Qwest – Judy Schultz	CLOSED Jan 22	Susie Bliss will provide overview of the process at the Sep 19 CMP product/process meeting. Defer until discussion on Scope is scheduled. Scheduled call on October 5 – Susie Bliss. Minutes posted to Redesign website 10-29-01 Qwest is prepared to discuss and close this Action Item. DECISION: Redesign Team decided to close

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							this item and create a separate issue item to discuss the role of CMP in PCAT and Tech Pub changes.
71	Action	Sep 6 Meeting	Production Support Process	What is the current process for CLECs to report and Qwest to notify CLECs on production problems—what is the production support process and timeline? Where is the CLEC documentation pertaining to this information?	Qwest – Wendy Green	CLOSED Sep 18	COMPLETED: Notification distributed and posted by Tina Hubis on Sep 10. Defer to Scope and Section 12 Production Support discussions according to the re-design schedule
72	Issue	Sep 6 Meeting	CR Process	What is the process if the CLEC-originator does not agree with Qwest's reply or the CR is rejected?	Core Team	CLOSED Oct 3	Addressed on Sep 18, 20 during Escalation Process and the Dispute Resolution Process with further discussion during Oct 2-3 session. COMPLETED: Escalation and Dispute Resolution Process
73	Issue	Sep 5 Meeting	Account Management	Clarify roles and responsibility of Service Managers and Sales Managers. What is the internal notification process (e.g., advanced notice before CLEC) for Service Managers on CLEC notices?	Qwest – Judy Schultz	CLOSED Oct 3 (Address at Oct 17 CMP meeting)	Subsequent to the Sep 5-6 session, Qwest requests to address this item at the Oct 3 meeting to allow the Service Management Director to participate in-person in Minneapolis. DECISION: Will address at the Oct 17 Product/Process CMP meeting
74	Issue	Sep 5 Meeting	CR Process Dispute	What is the process if the CLEC-originator does not agree with reply or rejected CR	Core Team	Oct 2	Duplicative of #72
75	Action	Sep 18 Meeting	Redlined Framework	Review the Red-lined working document for successive working	Bahner, Clauson,	CLOSED Sep 18	COMPLETED: Jim Maher restructured the

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				sessions	Maier, Wicks		MASTER REDLINED CMP Re- design Framework based on input from Core Team members.
76	Action	Sep 18 Meeting	Escalation URL	Create URL for Escalated issues to be submitted	Qwest – Schultz	CLOSED Oct 16	Should include issue and proposed solution COMPLETED: URL for Escalation is available for issue and response.
78	Issue	Sep 18 Meeting	Escalation Posting on Web Site	What is a reasonable time frame for posting an escalation issue and response (e.g., within one business day)?	Qwest – Judy Schultz	CLOSED Oct 16	COMPLETED: Language under Escalation
79	Issue	Sep 18 Meeting	Escalation Mail- out	Can a mail-out process be established for Escalated items (issue and response)?	Qwest – Judy Schultz	CLOSED Oct 16	Qwest will send email to all CLECs once an escalation has been initiated
80	Action	Sep 18 Meeting	Escalation	Draft proposed language regarding time frames for Qwest to provide binding position on an escalated issue (e.g., 7 or 14 calendar days). Also include binding authority language.	Qwest – Judy Schultz	CLOSED Oct 3	COMPLETED: CLEC and Qwest agreed to a 7-day interval for escalated CRs and 14 days for other non-CR issues. Language reflected in the Master Redline framework.
81	Issue	Sep 18 Meeting	Escalation	During “14-day” response cycle, will Qwest continue efforts (e.g., CR) or will activity stop?	Qwest – Judy Schultz	CLOSED Oct 3	DECISION: Requestor may ask that activity stop or continue. Language reflected in the Master Redline framework
82	Issue	Sep 18 Meeting	Escalation	How are CLECs notified that an issue has been escalated between monthly CMP meetings?	Core Team	CLOSED Sep 20	DECISION: CLECs will be notified via formal notice to access web site for information.
83	Issue	Sep 18	Dispute	Does an issue have to go through the	Core Team	CLOSED	DECISION:

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting	Resolution	escalation process before it is goes through the dispute resolution process?		Oct 3	No
84	Action	Sep 18 Meeting	Dispute Resolution	Propose language around dispute resolution ADR process. Do we want to sight specific organizations??	Andy Crain and CLEC Attorneys	CLOSED Oct 3	COMPLETED: Language reflected in Master Redline framework
85	Issue	Sep 18 Meeting	Dispute Resolution	What is the process for CLEC-CLEC consensus and the Dispute Resolution Process?	Core Team	CLOSED Oct 3	COMPLETED: Language reflected in Master Redline framework
86	Issue	Sep 18 Meeting	Dispute Resolution	When can Why would Qwest invoke the Dispute Resolution Process?	Qwest—Andy Crain	CLOSED Oct 3	Andy can't think of anything – we should leave in anyway. Tom Dixon: Close, but keep in mind that Qwest will probably never use it
87	Action	Sep 18 Meeting	Re-design Impasse Resolution	Propose language around the CMP re-design impasse resolution process/dispute resolution process.	Qwest—Andy Crain	CLOSED Oct 3	COMPLETED: Refer to CMP Redesign Procedures on Voting and Impasse Resolution Process document on the CMP Redesign web site.
90	Action	Sep 18 Meeting	Network outage notification	Distribute notification of CLEC questionnaire with Network Outage notification option for pager notification.	Matt Rossi	CLOSED Sep 18	DECISION: An action item for the monthly CMP Product/Process
91	Action	Sep 18 Meeting	Introduction and Scope	Define “good faith” and normal CMP process —(3.4.1)	Tom Dixon /Beth Woodcock	CLOSED Nov 29	Proposed language provided to redesign via email on Nov 1. Tom Dixon provided the definition in the “Terms” document. The definition was added to the Master Red Lined document in the Dispute Resolution section. COMPLETED: Language under Introduction and

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
92	Action	Sep 18 Meeting	CR Process	Include in the CR Process a step for CLECs to discuss the CR after clarification process and before prioritization.	Core Team	CLOSED Nov 1	Scope, and Terms. Sub-committee to create language and distribute to Core Team by Sep 27. Oct 3: Qwest to put language around these issues Oct 16: Qwest will share proposed language at the next session. Nov 1: Discussed and agreed on CR Initiation Process language.
95	Issue	Sep 20 Meeting	Parity	What is the process for discovering retail parity issues after the conclusion of the 271 workshops? 10/16: CLECs to review information on the web site and provide comments at the Oct 30-Nov 1 re-design session.	Core Team	CLOSED Nov 29	Qwest to provide checklist used by Retail to screen change proposals for potential CLEC impacting. Related to #105. 10/16 COMPLETED: This checklist is on the CMP re-design web site under Re-Design documentation. 11/29: Close issue, but Mitch will provide Judy Schultz with questions prior to discussion at a future session.
96	Action	Sep 20 Meeting	Intro – Scope	Draft proposed language for introduction and scope for the October 2 meeting	Core Team	CLOSED Oct 2	All Core Team members to share proposed language by Sep 27 with rest of members. Karen Clausen is the lead for CLEC language. DECISION: Re-visit during Product/Process CMP discussions.
97	Action	Sep 20	Types of Changes	Have legal personnel verify the intent	Qwest—	CLOSED	Language for Types of Changes

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
98	Issue		Meeting	with the proposed language around types of changes (contractual agreement) for the red lined document.	Judy Schultz	Oct 3	under Regulatory
99	Action	Sep 20 Meeting	CR Process	How many days after receipt of the CR will Qwest contact the originator to clarify CR if necessary?	Qwest—Judy Schultz	CLOSED Oct 16	DECISION: Qwest agree to remove "contractual agreement" language. COMPLETED: Language for CR Initiation
101	Action	Sep 20 Meeting	CR Process	Qwest to provide language on Production Support. Also address severity levels and defects. Review the start time of the first day for future working sessions.	Qwest—Judy Schultz	CLOSED Nov 29	COMPLETED: Qwest provided the language.
102	Action	Sep 20 Meeting	Schedule Working Sessions	Can Qwest provide net-meeting capability at its location to limit Core Team member travel?	Core Team	CLOSED Oct 2	DECISION: Begin at 9am MT—refer to schedule on CMP redesign site
103	Action	Sep 20 Meeting	Schedule Working Sessions	Clean up the CMP Re-design Web Site to house the latest version of documents.	Qwest—Matt Rossi	CLOSED Sep 27	DECISION: Yes – only at Qwest locations
109	Action	Sep 20 Meeting	CMP Re-design Web Site	Put together a snapshot view of notifications to be released going forward in order to formulate and implement an adequate interim process for CLEC notification for PCA and Tech Pub changes.	Qwest—Jim Maher	CLOSED Oct 16	COMPLETED: Archive page set up – date placed on each document
	Oct 2 Meeting	PCAT—Tech Pub Notification			Qwest—Judy Schultz (Susie Bliss)	CLOSED Nov 29	Presented during Oct 3 re-design conference call scheduled for Oct 5 to discuss. 10/16: PCAT schedule will be posted by 10/19; Tech Pub and OSS Interface schedules will be posted by 10/26. 11/1: Judy Schultz provided the Core Team with a revised matrix of upcoming notifications.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
111	Issue	Oct 3 Meeting	Document	CLEC consensus on "red lining" document changes and to include a running log in front of the document highlighting the changes 10/16: Provide samples of historical change logs for Core Team to review and discussion.	Judy Lee	CLOSED Nov 29	DECISION: Close action item. Qwest will continue to provide the revised notification matrix. CLECs need to see sample of red-lined document and historical change log 10/16: Sandy Evans provided Judy Lee with a sample from BellSouth. Judy Lee to share samples with the Core Team at the next session. 10/30: Samples of historical change logs were shared with Core Team and posted on the web site. COMPLETED: 11-29-01 Core Team provided input to Qwest. Related to Issues 201-203.
112	Issue	Oct 3 Meeting	Document	Provide determination on whether or not Qwest can go back and "red line" as per the committed to going forward process for document change notification and if so – how far back	Qwest – Judy Schultz (Dana)	CLOSED Oct 16 (canceled)	Duplicate item to #108 and 109
113	Issue	Oct 3 Meeting	Interim Exception Process	How do you call a special CMP meeting outside of the general CMP meeting? Re-visit interim exception process.	Core Team	CLOSED Oct 3	DECISION: Refer to Interim Exception Process on CMP redesign web site.
114	Issue/ Action	Oct 3 Meeting	CLEC Impacting Check Sheet	Put together internal check sheet to assist Qwest in assessing whether a change is CLEC impacting	Qwest – Judy Schultz (Susie)	CLOSED Oct 29	Attendees include – but are not limited to: Allegiance WCom

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				Susie to set up a meeting with the CLECs to discuss on Oct 5. 10/16: Qwest to distribute minutes from the 10/5 Susie Bliss call and to share with the re-design Core Team the check sheet at the next session.	Bliss)		Eschelon AT&T 10/16: Several items were stated with the idea that this list will be 'living' and will be updated as necessary. Qwest to share minutes from Oct 5 Susie Bliss call and the check sheet to determine if a change is CLEC impacting at the next session. COMPLETED: Meeting minutes to the Oct 5 conference call has been posted: CMP Re-design web site, titled "CMP Redesign CLEC-Qwest Conference Call Oct 5 Final Minutes – 10-29-01."
117	Issue	Oct 3 Meeting	CMP Re-design Location	Should the team re-check the location for the Oct 30, 31 and Nov 1 redesign meeting? Does it make sense to move the meeting to Denver?	Core Team	CLOSED Oct 3	DECISION: Eschelon, Integra and Allegiance will meet in Denver (originally planned for Minneapolis). Sprint may join in Denver or via phone.
119	Action	Oct 3 Meeting	Video Conference	Can Qwest provide video conferencing capability for the CMP redesign meetings?	Qwest— Judy Schultz	CLOSED Oct 16	DECISION: Small rooms – 20 people – we got more speakers now in Denver.
120	Action	Oct 2 Meeting	Qwest's Status Report Filing	Determine what should be 'highlighted' in the Master Redline framework to show element/s discussed.	Core Team	CLOSED Oct 16	COMPLETED: Red lined master included in filing
121	Action	Oct 2 Meeting	Qwest's Status Report Filing	Timeframe for CLEC review of Qwest's Status Report	Core Team Andy Crain	CLOSED Oct 16	COMPLETED: Oct 2: Andy Crain shared draft Status Report with redesign Core

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				<ul style="list-style-type: none"> - CLEC comments to Andy no later than close of business Fri, Oct 5 - Andy Crain issues revised document by Mon, Oct 8 COB - Additional CLEC comments to Andy by Tues, Oct 9 5pm MT - Qwest files Wed, Oct 10 			Team
122	Issue	Oct 2 Meeting	Source of Change	How should Qwest display 'source of change' in documents?	Core Team	CLOSED Oct 3	DECISION: Show SOURCE as a identifier on mail-out letters and include all sources with details in the historical change log.
123	Issue	Oct 3 Meeting	Interim Process	<p>Do we agree to adopt the Proposed Interim CMP CR workflow for Product and Process as language included (but not limited to) in the Master Redlined framework.</p> <ul style="list-style-type: none"> - Want a final review of proposed redlined language 	Core Team	CLOSED Oct 16	COMPLETED: Andy Crain provided a redlined document proposal for Core Team review
124	Issue	Oct 3 Meeting	Qwest's Status Report Filing	CLECs request Qwest to refer in the Status Report that the entire redlined document is an interim draft (not final but operational) until final approval by all parties has been completed.	Qwest— Andy Crain	CLOSED Oct 16	COMPLETED: Master Redlined is now noted as Interim Draft.
125	Issue	Oct 3 Meeting	Interim Process	Do the CLECs agree to adopt the Proposed Interim CMP CR workflow for Product and Process as the "interim" CMP process for CLEC originated CRs?	Core Team	CLOSED Oct 3	DECISION: Yes, and to be implemented ASAP.
127	Action	Oct 16 Meeting	CR Initiation Form	Allow an entry to provide available timeslots for Clarification Meeting	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED: Form has been updated for CLECs to provide available timeslots for the Clarification Meeting.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
128	Issue	Oct 16 Meeting	CR Initiation Process	When does a CR become the responsibility of the CMP community vs. the CR originator?	Core Team	CLOSED Oct 16	DECISION: A CR becomes the responsibility of the CMP community when Qwest provides a response to that CR.
129	Action	Oct 16 Meeting	Master Redlined Framework	Mark the framework as "interim draft"	Qwest— Jim Maher	CLOSED Oct 16	COMPLETED: Master Redlined document is now marked "Interim Draft"
130	Issue	Oct 16 Meeting	CR Initiation Process—Product/ Process	What is the timeframe when Qwest provides a notice on a CR response and be able to post on the website?	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED: Language under interim CR Initiation Process
131	Issue	Oct 16 Meeting	Master Redlined Framework	Can the framework include Tables to clarify steps and timeframes for each process such as the BellSouth Change Control framework? 10/16: Sandy Evans will create a Table to seek consensus at the next session.	Sprint— Sandy Evans	CLOSED Nov 29	DECISION: After the Core Team baseline the entire master redline framework, the Team will decide then if tables are needed.
132	Action	Oct 16 Meeting	12-Month Development View	Review the release calendar to insure details are included for Release 9.0 and 9.1.	Qwest— Mark Routh	CLOSED Nov 29	COMPLETED: Release calendar with details on the web site
134	Issue	Oct 16 Meeting	OSS Interface Releases	How many releases will Qwest implement in a calendar year—will it implement no more than 4 major releases? And does this apply to GUI implementation?	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED: Language under Change to Existing Interfaces • Application-to-application • GUI
135	Issue	Oct 30 Meeting	Issue	What is the process for Qwest-initiated CR that are non-regulatory mandated changes?	Core Team	CLOSED Oct 30	COMPLETED: CR Initiation Process addresses both Qwest and CLEC initiated CRs that are non-regulatory changes.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
136	Issue	Oct 30 Meeting	Redesign Meeting Minutes	What is the timeframe CMP Redesign meeting minutes?	Core Team	CLOSED Oct 30	DECISION: <ul style="list-style-type: none"> For 1-day Sessions: Qwest to provide draft meeting minutes no later than <u>5 business days</u> for Core Team to review For 2 or more days Sessions: Qwest to provide draft minutes no later than <u>7 business days</u> for Core Team review Participant Feedback: same as <u>above</u> Qwest to distribute and post <u>Final meeting minutes within 2 business days</u> after comments are due from participants.
138	Action	Oct 30 Meeting	OBF Language	Verify if OBF intended for maximum number of major releases (e.g., maximum of 4 major releases) per calendar year applies to each OSS, or a total of 4 major releases for all OSSs combined?	ATT— Mitch Menezes	CLOSED Nov 29	Qwest proposes no more than 4 major releases per OSS interface in a calendar year. DECISION: 11/29: Qwest will limit the releases for IMA to 4 major releases per year
144	Issue	Oct 30 Meeting	Change to An Existing OSS Interface	Provide language to address the earliest conversion time to the newly IMA-EDI release is the weekend after the Release Production Date.	Jeff Thompson/ Mitch Menezes/ Beth Woodcock	CLOSED Oct 30	COMPLETED: Language under Changes to An Existing OSS Interface
147	Issue	Oct 30 Meeting	OSS Interface CR Initiation	Develop narrative to reflect actual timeline to Qwest proposed Candidate List process.	Qwest— Jeff Thompson	CLOSED Oct 30	COMPLETED: Language: OSS Interface CR Initiation Process

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
150	Issue	Oct 31 Meeting	Prioritization	Is prioritization on a per OSS interface basis?	Qwest— Jeff Thompson	CLOSED Feb 7	11/13: Prioritization of a CR is on a per OSS interface basis.
154	Action	Oct 31 Meeting	Qwest Considers CLEC Comments in Final Notice	Insert language pertaining to Qwest will consider CLEC comments/ concerns into the Final Notice.	Qwest— Jeff Thompson	CLOSED Oct 31	COMPLETED: Language: Introduction of a New OSS Interface.
155	Action	Oct 31 Meeting	Reformat Proposed Language	Reformat the Retirement of an OSS Interface to separate GUI language from application-to-application.	Qwest— Judy Schultz	CLOSED Nov 1	COMPLETED; Language: reformatted Retirement of an OSS Interface.
157	Issue	Nov 1 Meeting	Same Time Availability of Comparable Functionality for IMA EDI and GUI	Develop language to insure comparable functionality for IMA EDI users are available at the same time as IMA GUI users.	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: Change to An Existing OSS Interface.
159	Action	Nov 1 Meeting	New OSS Interface	Add language: With a new OSS interface, Qwest and CLECs may define the scope of functionality introduced as part of that interface.”	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: Introduction of A New OSS Interface
160	Action	Nov 1 Meeting	OSS Interface CR Initiation Process	Add picture or listings of timeline milestones.	Qwest— Jeff Thompson	CLOSED Nov 1	COMPLETED: Language: OSS Interface CR Initiation Process
161	Action	Nov 1 Meeting	Proposed Language Documents	Provide Core Team members and participants with the redlined proposed language documents: <ul style="list-style-type: none"> New OSS Interface and OSS Interface CR Initiation: Re-do timelines to align with narrative; send redlined to team (Maher by Nov 2); team to review and provide comments (by Wed, Nov 7); insert language into the Master Redlined 	Qwest— Jim Maher and Core Team	CLOSED Nov 7	COMPLETED: Documents are posted on the web site.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
				<p>Framework with CLEC comments (for next meeting distribution); modify Qwest internal M&P (Schultz)</p> <ul style="list-style-type: none"> Retirement of OSS Interfaces: send redlined to team (Maher by Nov 2); insert language into the Master Redlined Framework with CLEC comments (for next meeting distribution); modify Qwest internal M&P (Schultz) 			
164	Action	Nov 1 Meeting	CR Initiation Form	Update CR Form: Change "submitted by" and "submitter" to "originator" and "originated by" respectively.	Qwest— Mark Routh	CLOSED Nov 13	COMPLETED: CR Form has been updated and will be presented at the general CMP meetings on 11/14 and 11/15.
165	Action	Nov 1 Meeting	CR Initiation Form	List out ancillary products and correct "operations" to "Operator Services." Also, remove INP.	Qwest— Matt Rossi	CLOSED Nov 13	COMPLETED: CR Form has been updated and will be presented at the general CMP meetings on 11/14 and 11/15.
166	Issue	Nov 1 Meeting	Source Information for Regulatory Mandate CRs	Qwest needs to provide the source with timeline (e.g., effective date and implementation date) for Regulatory changes.	Qwest— Judy Schultz	CLOSED Nov 1	DECISION: Qwest will provide source information for Regulatory types of changes.
171	Issue	Nov 1 Meeting Nov 28 Meeting	IMA 10.0 Changes	<p>What is the rationale for six (6) IMA 10.0 changes to be treated as Regulatory changes?</p> <p><u>Provide the details for CRs for the 5 remaining "regulatory" CRs on the IMA 10.0 list. Include supporting documentation (site the FCC order).</u></p>	Qwest— Mark Routh & Jeff Thompson	CLOSED Feb 5	<p>11/19 meeting to discuss rationale. Qwest to email material and post on the web site by 11/14.</p> <p>11/30: Qwest to provide details on the CRs.</p> <p>COMPLETED: Already addressed in CMP Systems Meeting</p>

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
175	Action	Oct 31 Meeting	Core Team Membership	Contact those CLECs that are now dropped as a Core Team member, but may re-active their membership status.	Judy Lee	CLOSED Jan 24	10/31: Rhythms and Scindo will no longer participate. 11/6: Emailed Electric Lightwave, Integra, McLeodUSA, Premier and XO. Contact information not available for Level 3. Integra wants to be a member; McLeod will no longer participate; Premier will continue as a participant. 12/13: XO Communications will not participate with redesign. Sprint has withdrawn from the core team per the email from Sandy Evans.
176	Action	Nov 13 Meeting	OSS Elements	Review and compare CMP red lined document to all other related documents (i.e. 18 point, OBF 2233, open issues log, CLEC issues etc.) to ensure completeness of the proposed Qwest CMP Process and make any changes that may be necessary. Identify additional for OSS Interface, Product/Process and overall elements.	Core Team	CLOSED Jan 18	By Jan 11 Noon Mountain time: Every Core Team member and participant to provide results of review and compare document to Jim Maher. By Jan 18: Jim Maher to send a compilation matrix with CLEC-Qwest-Lee input to the Core Team. Individual Team documents will also be shared with the team. COMPLETED: A combined Gap Analysis along with individual submissions were included in the January Redesign distribution package.
183	Action	Nov 13 Meeting	CMP Gaps	Judy Lee to compare and report any gaps in mapping red-lined document to OBF 2233	Judy Lee	CLOSED Jan 24	Related to #176 Include as part of Core Team matrix for Jan 22-24 session.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							COMPLETED: Included in Jan 18 Redesign distribution package.
185	Issue	Nov 13 Meeting	Interface Testing	Re-word language to address "Provided a CLEC uses the same connectivity option as it uses in production, the CLEC should, in general, experience response times similar to production."	Qwest— Jeff Thompson	CLOSED Nov 27	Language added to master redline under Interface Testing.
186	Action	Nov 27 Meeting 12/10 Meeting	Test Scenarios	Are test scenarios provided separately from Tech. Specs or included? (include in Changes to Existing OSS Interfaces section and Application to Application Interface Testing Section) 12/11: Review proposed certification/re-certification language at the next working session.	Qwest— Teresa Jacobs Andy Crain	CLOSED Feb 6	11/27: Qwest is ready to include the following language in the Master Redlined Framework and to close this item. "A re-certification notification is sent 5 weeks prior to the release, which outlines the transactions and activity types, which have changed in the new release and should be retested. This is sent via the normal CMP notification process." 12/10: Andy Crain to clarify section 1.1 (pg 61) of the Red Lined document for the 12/11 meeting. 12/11: Andy Crain provided proposed language for certification/re-certification for the Team to review at the next working session. COMPLETED: 2/6: Team reviewed and inserted language under Interface Testing

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
188	Action	Nov 27 Meeting	Production Support	Production support notification to include Qwest internal trouble ticket number	Qwest— Judy Schultz	CLOSED Dec 10	COMPLETED: Language included in Production Support.
189	Action	Nov 27 Meeting	Escalation Process	Draft proposal(s) for an escalation process for technical production problems for both CLECs and Qwest. 12/11: The team should determine how to notify the CLECs that a trouble ticket has been escalated.	Qwest— Teresa Jacobs	CLOSED Feb 6	Defining escalation candidates/triggers, criteria, initiators, escalation agents/people who will receive the escalation, escalation contacts, methods, communication feedback & follow up, how to keep lists current, implementation plan. Initial draft planned for 12/17. CLECs will be solicited starting week of 12/17. Will bring language to Jan. redesign meeting. Teresa will call the following for input: Leilani Hines – WorldCom Terry Bahner – AT&T Karen Clauson – Eschelon COMPLETED: Team reviewed language. Qwest will present at the 2/21 CMP Systems Meeting for review and acceptance. Technical Escalation Process will be a stand-alone document governed by CMP.
190	Action	Nov 27 Meeting	Severity Level	Determine, when one CLEC is severely impacted, whether this will ever be considered a Severity 1	Qwest— Teresa Jacobs	CLOSED Dec 10	11/28: Ready to close issue with Core Team at next session. COMPLETED:

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
191	Action	Nov 27 Meeting	IT Help Desk	Validate that the Parent and children trouble tickets are linked and closed.	Qwest— Teresa Jacobs	CLOSED Dec 10	<p>Per Teresa, CLEC will have the ability to open a severity 1 ticket if the description of the CLEC problem matches the definition of a severity 1 ticket.</p> <p>11/28: Ready to close issue with Core Team at next session. COMPLETED:</p> <p>Per Teresa, If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the Help Desk recognizes that it is the same problem, a new ticket is not created. The Help Desk documents each subsequent call in the main ticket.</p> <p>There are instances when a ticket has been opened, but the system problem has not yet been confirmed. If a CLEC calls in on the same problem, but it is not recognized as the same problem, another ticket may be created. At a later time, the system problem may be confirmed. In that case, one of the tickets becomes the main ticket, and the other tickets are linked to the main ticket. When the problem is closed, each ticket must be closed.</p>

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Language added to section 1.3 of Product Support
192	Action	Nov 27 Meeting	Severity Level 2 Problems	Eschelon wants to check if Qwest needs to continue trouble shooting severity level 2 problems outside of Help Desk hours of operation.	Eschelon—Karen Clauson	CLOSED Dec 10	COMPLETED: Language was added to 1.6 of Production Support that illustrates this.
193	Action	Nov 28 Meeting	IMA 10.0 prioritization	Send out an email to the Core Team that discusses the affinity between 25001 and 30623.	Qwest—Jeff Thompson	CLOSED Jan 24	COMPLETED: Jeff Thompson's response was distributed on Wed. December 5, 2001
194	Action	Nov 28 Meeting	IMA 10.0 prioritization	Provide an explanation as well as supporting regulatory document/s as to why the Number Pooling CR #30831 must be done in order for the system to continue to perform properly.	Qwest—Jeff Thompson	CLOSED Jan 24	COMPLETED: Jeff Thompson's response was distributed on Wed. December 5, 2001
198	Action	Nov 29 Meeting	Not CLEC Impacting Product/ Process	Send an email to Product and Process employees regarding how to handle changes for the next two weeks.	Qwest—Judy Schultz	CLOSED Dec 11	Judy Schultz to share the memo with the Core Team COMPLETED: Refer to CMP Redesign web site document named, "Excerpt from Schultz E-mail – Action Item 198"
199	Action	Nov 29 Meeting	Documentation Version Number	Verify that the version number is on the document. (CLECs want the Version # at the front of the document.)	Qwest—Judy Schultz (Kim K)	CLOSED Jan 22	11/29: Qwest will implement Version numbering on the top of the documents as they are published. Qwest is prepared to discuss and close this Action Item. 12/10: The CLECs have asked to keep Action Item open until implemented.

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							<p>DECISION: Close action item.</p> <p>COMPLETED: 1/7/02: Qwest has reviewed the current version control process and believes that at this point in time the existing process is adequate to meet the needs of this CMP.</p> <p>COMPLETED: 12/10: Versioning will work according to the following example: 1. Version 1.0 is operational 2. Insignificant change are made and published immediately, version is updated 3. Version 2.0 is operational 4. CR is created and version 2.0.a is put in the holding tank 5. Version 2.0 is still operational 6. Change is made to correct an error in the document, changes are published immediately and version is updated 7. Version 3.0 is operational 8. It is time to implement the changes in the holding tank (version 2.0.a). The highlighted changes in version 2.0.a are merged with operational version 3.0 and version 4.0 is created</p>
200	Action	Nov 29 Meeting	Documentation Version Control Tools	Review existing Documentation Version Control tools to see if one will fulfill the CMP needs.	Qwest— Mark Routh	CLOSED Jan 22	
201	Action	Nov 29 Meeting	Documentation	Meet with the Documentation team regarding holding tank and operational versions. Discuss how the history log will work with the holding tank documents.	Qwest— Judy Schultz (Kim K.)	CLOSED Jan 22	

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							9. Version 4.0 is operational. There will be no history log in the holding tank. The link to the history Log in the downloadable documents will be a dead link.
202	Action	Nov 29 Meeting	Documentation	Update the Documentation History Log	Qwest— Judy Schultz (Kim K.)	CLOSED Jan 22	COMPLETED: 12/17: History log has been updated to reflect the requested changes by the CLECs. It is important to note that since the PCAT does not have section numbers, so this column will be blank for PCAT changes. (Refer to sample History Change Log on the CMP Redesign web site.) A History Change Log will be provided for non-FCC technical publications. Qwest follows the FCC guidelines for technical publications, which does not contain a history change log.
203	Action	Nov 29 Meeting	Documentation	With the Historical log there will be a separate log for the PCAT Topical section (drop down list).	Qwest— Judy Schultz (Kim K.)	CLOSED Jan 22	COMPLETED: 12/17: Each topical section of the PCAT is it's own document and thus will have its own history log.
204	Issue	Nov 29 Meeting	Documentation	How will Qwest insure that the dot changes and holding tank changes get updated on the operational version?	Qwest— Judy Schultz	CLOSED Jan 22	COMPLETED: 12/17: Qwest does not overwrite the

CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
					(Kim K.)		HTML version of the PCAT each time a new version is created. When the PCAT requires changes, the HTML version is downloaded into Microsoft Word, the changes are made to the Word document with green highlighting indicating what is being added and what is being deleted. The green highlighting is passed on to the web team. The web team then incorporates the changes highlighted in green into the production version of the HTML document. Therefore, if changes are sitting in the holding tank for review and during the holding tank cycle other changes are made to the PCAT, the changes made in the middle will not be over written. Once the changes are made by the web team, the documentation team does a quality check to make sure the changes were incorporated correctly.
205	Action	Dec 10 Meeting	Notification	Capture Event Notification channels for CLECs and Communicate back to the CMP redesign team. Identify document with Event Notification subscription process.	Qwest— Jeff Thompson	CLOSED Feb 6	01/22: Communicator with subscription process posted to Redesign Web site. COMPLETED: Shared with Redesign Team.
207	Action	Dec 10	IT Help Desk	Investigate IT Help Desk VRU to clarify	Qwest—	CLOSED	12/21: Terry Bahner-AT&T will

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
		Meeting		option #3. Verify that Option #1 will prompt an ISC ticket	Teresa Jacobs	Feb 6	provide Qwest with suggestions following the holidays. 01/14: Issue captured in AT&T Gap Analysis DECISION: 2/6: ATT to issue a CR if there is a request for changes to the VRU Language provided by Andy Crain to Core Team for discussion at next session.
208	Action	Dec 11 Meeting	Interface Testing (Non-production problems)	Add language in the Interface Testing section (?) to address the issue about finding a bug in the production code in the test environment: Process for addressing Non-Production support problems that arise in interface testing.	Qwest— Andy Crain	CLOSED Feb 6	01/21: Production code problems identified in the test environment will be resolved using the process outlined in Section 11.0, Production Support.
209	Action	Dec 11 Meeting	Scheduled OSS Interface Maintenance	Propose language and time frame for scheduled maintenance. Notification and inclusion of known patches or any other known CLEC impacting changes. Whether scheduled maintenance. Included under production support or in another section in the Red Line Document.	Qwest— Teresa Jacobs (Barb Spence)	CLOSED Feb 6	01/10: See Action Items Language – 01-14-02
210	Action	Dec 11 Meeting	Production Support Implementation Date	Determine implementation date for Production Support process.	Qwest— Teresa Jacobs	CLOSED Feb 6	01/14: Qwest will implement all Production Support changes on 02/01/02, except the Technical Escalation Process. The Technical

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							Escalation Process will be implemented two weeks following acceptance at the CMP Monthly Meeting. 2/6: Qwest to present Technical Escalation Process at the 2/21 CMP Systems Meeting for review, discussion and acceptance.
211	Action	Dec 11 Meeting	Production Support	Production support CMP recommendations with a written list of changes from current process. Provide Severity 1 – 4 trouble tickets that are logged in the IT help desk system, and remain unresolved. Examples will be provided reflecting the format of the proposed implementation.	Qwest— Teresa Jacobs	CLOSED Feb 6	Provided in the January Systems CMP distribution package and presented and discussed at the January meeting. CLECs approved an interim test phase. COMPLETED: Open trouble ticket report were sent respective CLEC.
220	Action	Dec 11 Meeting	CMP Redesign Improvements	Review the CMP redesign improvements matrix from Judy Schultz, to insure that it addressed the WorldCom issue # 4.	Wcom— Liz Balvin	CLOSED Jan 22	COMPLETED: 01/22/02: Discussion held with additional input to Judy Schultz to revise matrix with more detailed information.
228	Action	Jan 22 Meeting	Example of Non-FCC Tech Pubs	Provide examples of FCC Tech Pubs vs Non-FCC Tech Pubs.	Qwest— Judy Schultz (Kessler)	CLOSED Feb 5	COMPLETED: Posted on the Redesign website titled "FCC/Non-FCC Tech Pub List – 01-30-02"
235	Action	Jan 24 Meeting	Event Notification	Update the language around the information provided in the initial (and subsequent) outage notifications	Qwest— Teresa Jacobs	CLOSED Feb 6	01/28: In order to be proactive, the Help Desk will send initial notifications as quickly as possible – fields on notification forms will be filled out as completely as possible with

**CLEC-Qwest Change Management Re-design Working Sessions
Core Team Issues/Action Items Log—CLOSED**

#	Issue/ Action	Originator	Category	Description	Owner	Due Date	Resolution/Remarks
							information available at that time. Thereafter, information related to any remaining open fields will be provided when known. COMPLETED: Language under Production Support
236	Action	Jan 24 Meeting	Web Notice Log	Check with Jarby Blackmun as to the launch date and location of the Notification Web site.	Qwest— Matt White	CLOSED Feb 5	COMPLETED 01/28; Customer Letter Notification page active 1/25/02. (http://www.qwest.com/wholesale/notices/)
241	Action	Feb 6 Meeting	Interface Testing	Insure language CLECs testing the Service Bureau configurations is incorporated in the Interface Testing document.	Qwest— Jeff Thompson	CLOSED Feb 6	COMPLETED: Language under Interface Testing

EXHIBIT C

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

AT&T Comments for Redesign
1/22/02

As a result of the CMP Product/Process Meeting held on January 16, 2002, AT&T has the following questions/comments, which we would like added as issues for discussion in CMP Redesign:

1. PC100101-4 (Eschelon CR) – “Developed, documented, trained and adhered to process to make sure that customer’s old VM boxes are removed when a customer leaves Qwest for a CLEC.”

The result of the discussion of this CR was the Qwest would do a systems change. When asked if the systems change would itself go through the CR process in CMP, the response from Qwest personnel was that (i) it would go through as a “STS UR”(?), (ii) since it was a non-IMA change maybe it did not need to go through CMP and (iii) since it was a non-IMA systems change it was not competing for resources (no prioritization was necessary).

Issues that come out of this:

- a. We need a discussion in Redesign of process for changes to non-IMA systems (billing, back-end, what else?) to insure that we address them in the Master Redline.
 - b. What is an STS UR and why wouldn’t that become a CMP CR?
 - c. What did it mean when Jim Beers said that the non-IMA systems change was not competing for resources?
 - d. If certain systems changes are just worked without a CR or prioritization how is the schedule for their progress and implementation communicated to CLECs?
2. PC102601-1 (AT&T CR) – “RCID/ZCID assignment for UNE-P”

The result of the discussion of this CR was that Qwest wanted to close this Product/Process CR and open a systems CR to “consider the best way of meeting this business need.”

Issues that come out of this:

- a. The Product/Process CR was originally submitted on 10/25/01. Qwest did not recommend closure and replacement with a systems CR until the 1/16/02 CMP meeting. That took nearly 3 months. Why so long? There should be some kind of screening process that identifies the kind of

change (systems vs. product/process) more quickly.

- b. Now that this CR has to be open as a new systems CR it looks like we have to start all over again and that the 3 months since the initial Product/Process CR is lost. How do we address this kind of problem? Should initial work by the IT group start after the meeting where the Product/Process CR is closed in favor of a systems CR?
- c. Who is responsible for opening the systems CR – Qwest or the CLEC that initiated the Product/Process CR?

3. PC102901-1 (Eschelon CR) – Qwest to include PON on Qwest Winback Orders.”

As a result of the discussion of this CR, Qwest will do a “systems fix” and thinks it will be completed in second quarter. Moved to development.

Issues that come out of this:

- a. Apparently, this systems change does not require that a systems CR be opened? Why not? Why is this treated differently from the AT&T CR referenced above (PC102601-1) that requires a new systems CR be opened?
- b. If this systems change will occur without going through the systems CR process, what happens to prioritization and the issue of competing for Qwest resources?
- c. Is there a category (or categories) of systems changes that just go through unencumbered by the CR process and prioritization?

4. PC110201-2 (AT&T CR) – “Partial turn-up of circuits on multiple related LSRs.”

Qwest reported at the CMP meeting that there already exists a Qwest process that does what AT&T requested in its CR (what AT&T wants is already part of the LSR submission process that has been in place for a long time). AT&T initiated the CR because Qwest told us that what we sought was not the Qwest process. This happened at one of the biweekly quality calls between AT&T and Qwest where Qwest SMEs were in attendance to consult with on this issue. The Qwest service management team advised that AT&T should take the issue to CMP.

Issue that comes out of this:

- a. AT&T should not have been required to do a CR. Qwest personnel should know what Qwest processes are and track them down to resolution before sending a CLEC to CMP. There has been CLEC frustration that the account team and service managers are quick to say “take it to CMP”

without necessarily doing all that should be done by them to research and resolve this issue. This is a good example of that problem and a situation where CMP should not be the solution.

5. Qwest has been stating in regulatory filings and proceedings that the systems work of CMP redesign is complete and that systems is the only thing the FCC cares about in evaluating an ILEC's CMP (hence, state commissions don't need to wait for product/process to be completed). How is it then that by attending only part of a CMP product/process meeting, we come away with four systems issues? The AT&T redesign team doesn't see how Qwest can say we are done with redesign of CMP with regard to systems when this kind of crossover exists and product/process has not been redesigned. It is apparent that systems and product/process go hand-in-hand.

6. Premium directory listings – There was apparently a discussion at the CLEC forum earlier in the week that Qwest intends to start charging for premium listings. In addition, Qwest is considering back billing for this service (to no earlier than October 2001). This was discussed briefly at the CMP Product/Process meeting. Qwest intends to simply provide notice, then start charging CLECs. This would be done without informing CLECs of what provisions in their interconnection agreements with Qwest permit Qwest to charge for this service and without explaining how Qwest has the right under the interconnection agreement to back bill. The explanation provided by Qwest at the CMP meeting is that the only redesigned process for Qwest product/process CRs has to do with OSS testing and SGAT workshops (the interim process we have discussed in Redesign). As a result, Qwest will follow its old process of notice and go even on changes that are CLEC impacting. Since this Qwest practice continues in spite of expressed CLEC concern, AT&T believes that this process needs to be worked out now.

EXHIBIT D

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

Performance Acceptance Certificate

Incident Work Order Number	AZIWO1076-1
Date/Time of Incident	04/11/01
Severity Level	1
Initiator	Robin Ferris
Date of Qwest Resolution	12/10/01
TAG Concurrence Date	

Description of Incident

The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.

Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.

The primary culprits here are the once-monthly CICMP meetings and their relation to internal development meetings, and the frequency of software releases (releases are scheduled approximately every four months).

The frequency of the CICMP meetings has the potential to slow down the CR process at several points. For instance, depending upon when a CLEC submits a CR, it can take anywhere from several days to an entire month for the CR to be initially "industry evaluated." If the CR requires clarification, it can take anywhere from several days to two months before it is discussed at its first CICMP meeting.

Having been initially discussed at the CICMP, meeting, the CR still has a minimum of two more CICMP meetings at which it must be discussed: once when it receives a "T-Shirt Size," and again after it has been prioritized and is baselined for release. If further clarification is required once the CR has been discussed at any of the aforementioned stages, the CR will need to come back to the CICMP once again. Each time the CR must come back to a CICMP meeting for discussion, there is the possibility that it will have to wait nearly a month for one to come along.

The attached table shows the lifecycle of CICMP CRs that were released in IMA/EDI version 6.0. Not counting CRs 4267810 and 5043023, which are process-related and not system-related, the average time it took the CRs to make it into a software release from their initiation was 12.5 months.

Resolution

Qwest Response Summary:

At this time Qwest has requested the Description of Incident to be clarified so that we can better understand what the specific incident(s) is we need to address in our response. The due date for the official Qwest Response will be determined based on the date we receive the clarification.

Qwest Supplemental Response 4/17/2001:

Qwest has initiated improvements to the CICMP process beginning in November 2000, and continues to implement improvements. These improvements have made it possible to reduce the time required for CRs to be "industry evaluated" to three business days. If a CR requires clarification, the current process requires the clarification to be provided immediately. Additionally, the "t-shirt size" is conducted immediately upon receipt of a CR rather than holding it for a scheduled review meeting. Once the CR is t-shirt sized, the CR is eligible for "industry prioritization".

The time frame for a CR to be selected for a release can range from three days to six months and is determined by the:

- Date CR is received
- Priority it is given by the CLECs
- Industry/Business needs
- Available capacity in a release

The Qwest once a month CICMP meetings are in line with other ILECs such as SBC and Bell Atlantic (Verizon) which have both been approved by the FCC.

To meet emergency needs of the CLECs, Industry requirements, and Qwest system updates, the Qwest CICMP process demonstrates flexibility by allowing for changes to the scheduled releases prior to the Release Scope Commitment date.

CGE&Y Supplemental Response 8/29/2001:

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233.

Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

Qwest Supplemental Response 10/25/2001:

The Change Request (CR) Processes used in the Change Management Process (CMP) have been reviewed, re-designed, and implemented.

Qwest conducted an assessment of the CMP (including the CR Process) during July, 2001. As a result of that assessment, which included feedback from the CLECs, Qwest proposed a number of changes designed to improve the CMP. The CLECs in attendance at the August CMP Monthly Meeting approved the changes. Qwest implemented the following measures to improve the timeliness and accuracy of the CR Process:

Project Managers were added to Qwest's CMP Staff to ensure the timely resolution of CRs and action items.

Qwest Subject Matter Experts (SMEs) now conduct a Clarification Meeting with the CLEC originator of a CR prior to the first CMP Monthly Meeting following receipt of a CR. The purpose of the Clarification Meeting is to ensure Qwest fully understands the CR and the expected deliverables.

Qwest SMEs conducted a Response Review meeting with the CLEC originator of a CR to present and discuss Qwest's proposed response to the CR. These meetings were held after the Clarification Meeting, but prior to the first CMP Monthly Meeting following receipt of the CR. Per the request of the CLEC participants who attended the September CMP Monthly Meeting, this practice has been discontinued. At the request of the CLECs, Qwest now presents its proposed response during either the first or the second CMP Monthly Meeting following receipt of the CR.

A database was developed to track CR status. The database houses all information pertinent to a given CR such as CR description, status, meeting minutes, draft and final responses etc. A report that captures all of this information is produced from the database and is provided on the web for the CLECs. This report provides near real time status on CRs.

An internal CR escalation process was established. Beginning two weeks before the CMP Monthly Meeting, CRs for which Qwest has not developed a response are escalated to the CMP Director on a daily basis.

The CMP Re-design Team, which is comprised of CLEC volunteers and Qwest participants, reached agreement on the interim CLEC Product and Process Change Request Initiation Process. This process has been implemented.

The CMP Re-design Team also reached agreement on the interim Qwest Product and Process Change Request



Initiation Process. This process is in the late stages of implementation. It will be fully implemented by November 15.

The OSS Interface Change Request Initiation Process was presented to and accepted by the CLEC participants who attended the September Systems CMP Monthly Meeting. This process was implemented on October 1, 2001.

The CMP Re-design Team reached agreement on the administration of CMP Monthly Meetings. This process has been implemented. Qwest expanded the CMP Monthly Meetings to 2 full days, per a request from the CLECs who participated in the September CMP Monthly Meeting. Please note that Qwest is willing to conduct CMP meetings on a more frequent basis, however, Qwest has not received a request from the CLECs to do so.

CGE&Y Supplemental Response 10/30/2001:

CGE&Y believes that AZIWO1076-1 should remain open for the following reasons:

- Although CGE&Y acknowledges that the CMP re-design process is being implemented piece-meal, as different parts are agreed upon, the process is still ongoing
- The specific subjects dealt with in the CMP IWOs issued by CGE&Y - "collaborativeness" of the CR review process, the lengthy lifecycle of CRs, and the timeliness of release of final EDI design worksheets - have not all been discussed, agreed upon, and/or implemented as part of the ongoing re-design process
- The above processes are either not at a complete enough stage, or have only just been implemented, and therefore CGE&Y is not yet able to make a confident assessment of them

CGE&Y acknowledges Qwest's statements made in its 10/25/01 supplemental responses to these IWOs, but feels it premature to close them due to the reasons stated above.

Qwest Supplemental Response 11/16/2001:

Qwest stated in the 10/25/01 response:

The CMP Re-design Team also reached agreement on the interim Qwest Product and Process Change Request Initiation Process. This process is in the late stages of implementation. It will be fully implemented by November 15.

Qwest and the CLECs reached agreement on the interim Product, Process, and OSS Interface CR processes. Qwest will process CRs in accordance with these processes effective with those received on or after November 15, 2001. The documentation in support of these processes may be found in the Master Red-Line document and the October and November CMP Re-design distribution packages, which reside on Qwest's CMP Re-design web site.

Resolution Submitted by:	Qwest	Date:	2/26/01 to 11/16/01
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Verification of Resolution

In response to AZIWO1076, Qwest has implemented improvements to its current process (i.e., not the re-designed process) to address CR processing timeliness problems. The following changes have been implemented by Qwest:

- A new CR tracking database has been developed to enable CMP managers to better track the progress of CRs
- Because of the new CR tracking database, up-to-date CR reports are now available, sorted various ways, on the CMP website
- Each CR is now assigned a Project Manager so that each CR is now treated within Qwest as a Project



- A Director of Change Management is assigned so that the Change Management function within Qwest now has the requisite authority to direct the work necessary to effect the requested changes

The affect of the above changes is that CRs are now processed by Qwest and presented to the CLEC community in a much more timely manner than before. As a result, CGE&Y is recommending closure of AZIWO1076.

Verification completed by:	Robin Ferris	Date:	12/10/01
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AT&T Comment (12/13/01):

It is premature to close this IWO before the CMP workshop scheduled for December 17 and 18, 2001. The workshop will provide CGE&Y and the TAG with information that should be sufficient to determine whether the underlying issues remain to be resolved or whether they will be resolved.

CGE&Y Reply (01/09/02):

Qwest has implemented the improvements previously outlined by CGE&Y; therefore this IWO remains closed.

TAG Recommendation

☐ **Approved**

☐ **Return to Qwest**

TAG Acceptance by:		Date:	



Test Vendor ID: IWO 1076-1
Qwest Internal Tracking ID: TI 222
Observation/IWO Title: Change Request (CR) Process Used in the CICMP
Test Type/Domain: Rel. Management / Robin Ferris
Date Qwest Received: 2/20/2001
Initial Response Date: 2/26/2001
Supplemental Response Date: 11/16/2001

Test Incident Summary:

The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.

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The primary culprits here are the once-monthly CICMP meetings and their relation to internal development meetings, and the frequency of software releases (releases are scheduled approximately every four months).

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CGE&Y Supplemental Response 10/30/2001:

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CGE&Y acknowledges Qwest's statements made in its 10/25/01 supplemental responses to these IWOs, but feels it premature to close them due to the reasons stated above.

Qwest Supplemental Response 11/16/2001:

~~AZIWO1076-1 QwestSupplemental Response 11_16_01.docAZ_TI222_IWO1076-~~

~~1-Supplemental Response 11_16_01AZ_TI222_IWO1076_Qwest_Supp_Response_11_16_01.doc2/19/200211/26/200111/~~

~~Qwest Communications, Inc.~~

~~Page 3 of 441~~

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Attachment(s): None



Westlaw

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Help



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**Administrative
Report**

51 CPUC 2d 530
Approx. 1 page



1993 WL 786894 (Cal.P.U.C.)

Re California-American Water Co
Decision 93-10-036
Application **93-07-057**

California Public Utilities Commission
October 6, 1993

California-American Water Co. authorized to issue and sell up to \$30 million in first mortgage bonds.

51 CPUC 2d 530, 1993 WL 786894 (Cal.P.U.C.)
END OF DOCUMENT

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Test Vendor ID: IWO 1078
Qwest Internal Tracking ID: TI 232
Observation/IWO Title: Final EDI Design Documents
Test Type/Domain: Relationship Management / Robin Ferris
Date Qwest Received: 2/26/2001
Formal Response Date: 3/5/2001

Test Incident Summary:

"Final" EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors. Qwest has had the following answers to this issue:

1. "Draft developer worksheets," which are developed by the EDI developers during their design process, are issued to the CLEC community approximately 60 days before a release. They are updated as needed until the release is final.
2. EDI releases are supported by Qwest for six months after the release of a newer version.

The problem with item #1 above is that the "draft developer worksheets" are exactly that: drafts. Due to their sheer size, however, the fact that they may change over time is a significant hindrance to using them as a design document. It has also been observed, particularly with IMA release 6.0, that the design documents and business rules continue to be refined even after the system is placed in production.

When the above point has been made to Qwest in the past, however, the response has always been item #2: that a CLEC can always use the previous release for six months after a new release, thus giving them time to use the "final" design documents to modify their system. While this is certainly true, it doesn't really address the problem, as remaining with a previous software release prevents CLECs from taking advantage of any expanded functionality offered by a new release.

The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest's. The lack of a true "requirements freeze" a sufficient time prior to production release, coupled with the lack of a true EDI testing environment, make it difficult for CLECs to successfully code their systems and do true user acceptance testing. IWO #AZIWO1068 has already been issued in regard to the EDI testing environment.

Qwest Response Summary:

Qwest's EDI release documentation notification procedures give the CLECs adequate time to prepare for an EDI release.

Qwest distributes initial EDI release requirements, Draft Developer Worksheets (DDW), 196 to 166¹ days prior to the recommended² CLEC implementation date. SBC distributes initial requirements for application to application interfaces between 152 and 172 days before implementation.³

¹ All times given in days are approximate and assume 30.4 days per month.

Draft Developer Worksheets contain all the technical specifications and business rules necessary to create an EDI interface to Qwest's systems, except EDI maps and the Data Dictionary, which are included in the Disclosure Document. DDWs change very little between the time they're distributed and the time of the release; however, should changes arise, they are announced to the CLECs in the Disclosure Document.

The Disclosure Document is released 49 days prior to the recommended CLEC implementation date. The Disclosure Document contains the following elements:

- Developer Worksheets
- EDI Mappings
- Data Dictionary
- Business Descriptions
- Business Models
- Change Summary

Qwest opens a release to testing 42 days prior to the recommended CLEC implementation date; in other words, four weeks before the release is implemented CLECs can begin testing on a release. Although system changes may be necessary during the testing period, CLECs could have the majority of their systems tested before the release is implemented.

Any changes between the Disclosure Document release and the Release Implementation are given to the CLECs in the Addendum to the release, which is distributed 14 days after Qwest's implementation of a release. Qwest considers the Addendum as the "final" design document. Qwest agrees that a stable and unchanging environment is necessary for CLECs to be able to interface with Qwest; when the Addendum is issued, our system is "stable and unchanging." Qwest recommends CLECs migrate to the release after the Addendum is issued.

Qwest's EDI release documentation notification timelines meet or exceed industry expectations, demonstrated by comparing SBC timelines to Qwest timelines.

CGE&Y Supplemental Response, 8/29/01:

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233. This re-designed process also addresses the timeliness of design documentation distribution.

Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

² The recommended CLEC implementation date is the day the Addendum is distributed, 14 days after the release date.

³ Texas decision at fn. 338.

**Performance Acceptance Certificate**

Incident Work Order Number	AZIWO1078
Date/Time of Incident	02/23/01
Severity Level	1
Initiator	Robin Ferris
Date of Qwest Resolution	12/10/01
TAG Concurrence Date	

Description of Incident

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Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

Qwest Supplemental Response 10/25/2001:

As part of the Change Management Process (CMP) re-design, Qwest has proposed to implement the following schedule effective with the IMA 10.0 Release. This schedule meets or exceeds the national industry standards as prescribed in OBF Issue 2233. This schedule will be discussed with the CLECs during the CMP Re-design meetings scheduled October 30 through November 1.

At the first CMP Monthly Meeting of each quarter, Qwest will provide a 12-month view of its OSS Interface Development Schedule.

Qwest will provide draft technical specifications at least 73 calendar days prior to implementing the release unless the Exception Process has been invoked. (Please note that the Exception Process may be invoked by either the CLECs or Qwest.) Technical specifications are documents that provide information the CLECs need to



code the interface.

CLECs have 15 calendar days from the initial publication of the draft technical specifications to provide written comments/questions regarding the documentation.

Qwest will sponsor a walkthrough for the CLECs beginning 68 calendar days prior to implementation. A walk through will afford CLEC Subject Matter Experts (SMEs) the opportunity to ask questions and discuss specific requirements with Qwest's technical team.

If the CLEC identifies issues or requires clarification, the CLEC must send Qwest written notification no sooner than 58 calendar days prior to implementation.

Qwest will review and respond to all CLEC issues, comments, or questions no later than 45 calendar days prior to implementation. This notification will include any changes made as a result of CLEC comments and will constitute the final technical specifications.

Qwest's planned implementation date will not be sooner than 45 calendar days from the date of the final technical specifications, unless the Exception Process is invoked. The implementation time line for the release will not begin until final technical specifications are provided. Emergency changes within the 30- calendar-day test window can occur without advance notification but will be posted within 24 hours of the change.

**Resolution Submitted
by:**

Qwest

Date: 3/5/01 to 10/25/01

Verification of Resolution

The release of EDI design documents is a topic that is being negotiated through the CMP re-design effort. At the beginning of the process Qwest proposed that it would adhere to the OBF 2233 proposal which calls for the release of draft design documentation 66 calendar days prior to a release and final documentation 45 calendar days prior. This topic has not reached a consensus state among the core re-design team, but CGE&Y considers the OBF proposal to be a reasonable timeframe in which to release draft and final design documentation.

Because of the collaborative nature of the re-design process CGE&Y expects that whatever decision is reached as to the timeliness of EDI documentation releases will have been accepted by the majority of the CLEC community. As a result, CGE&Y is recommending closure of AZIWO1078.

**Verification
completed by:**

Robin Ferris

Date: 12/10/01

AT&T Comment (12/13/01):

It is premature to close this IWO before the CMP workshop scheduled for December 17 and 18, 2001. The workshop will provide CGE&Y and the TAG with information that should be sufficient to determine whether the underlying issues remain to be resolved or whether they will be resolved.

CGE&Y Reply (01/09/02):

The latest "Master Red-Lined" CMP re-design document, dated 12-10-01, states, in part:

"Qwest's planned implementation date will not be sooner than one hundred (100) calendar days from the date of the final release requirements. The implementation time line for the release will not begin until final specification are provided"



This Language, if approved by the re-design team, exceeds the guidelines proposed by OBF.

It is CGE&Y's opinion that this IWO is to remain closed.

TAG Recommendation

☐

Approved

☐

Return to Qwest

TAG Acceptance by:		Date:	

Performance Acceptance Certificate

Incident Work Order Number	AZIWO1075-1
Date/Time of Incident	04/11/01
Severity Level	1
Initiator	Robin Ferris
Date of Qwest Resolution	12/10/01
TAG Concurrence Date	

Description of Incident

The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.

The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.

Specifics are provided below.

The primary functions of the CICMP, as stated in its charter, are:

To track and communicate CLEC-requested changes to the various Qwest interfaces.
To notify CLECs of CLEC-impacting changes.

Historically, however, CLEC requests have only accounted for a small percentage of the functionality added to any given release. For instance, IMA-GUI release 6.0 contains 24 changes or enhancements over release 5.2; and only 4 of them originated with a CLEC request.

Further, the Qwest-originated requests, which account for the majority of enhancements to these systems, are totally outside the scope of the CICMP process. They are not open for debate, prioritization, voting, etc., by the CLEC community. Not only are they not open for debate, the CICMP manager is not even involved in the process by which these internal requests are approved (as of November 2000).

In any software requirements management system, it is understood that the end-users are not the sole originators of CRs. It is a given, in fact, that Qwest will have the need to make architectural, code, or database modifications to its systems from time to time due to various internal requirements. It is also understandable that regulatory requirements will mandate changes to various CLEC systems. The fact remains that many of the enhancements that are generated internally by Qwest are related neither to architecture or regulatory concerns. Regardless of the source of the enhancement, however, the process by which these requests are made, voted on, prioritized, and implemented is not made available to the CLEC community in any way, nor do the CLECs have any input into it whatsoever. As a result, there is justifiable concern that the internal CRs are not subject to the same scrutiny and time-delay inherent in the CICMP process.

Best practices in software engineering dictate that software change management processes treat all CRs in a cohesive, uniform manner. Further, all stakeholders in the systems in question, including the end-users, must have representation at the change control meetings during which all changes are voted on. The fact that Qwest has two separate change management processes, one internal and one external, for the same systems is a deficiency.

The implementation of IMA Release 6.0 was an illustrative case. The following is a list of all enhancements implemented during the 6.0 release. Enhancements that originated as a CICMP CR are identified as such. The remaining CRs were internally developed by Qwest.



Flowthrough improvements (Blocking FID)
SAG only information and Address Validation
Access to loop information (CICMP CR 4261631)
UNE-P (POTS)
UNE-C PL (DS1, DS3)
UNE-P (Centrex) (Conversion only)
UNE-P (ISDN)
Resale Centrex – Centrex 21
Retrieve large CSRs
Pre-Order transaction: parsed CSR info (CICMP CR 4342063)
Additional lines on UBL conversion (CICMP CR 4185852)
Electronic Work Completion and Jeopardy Notification, and Manual Jeopardy Notification
Electronic FOC via IMA GUI
Electronic Reject Notification via IMA GUI
Electronic Billing Completion Notification via EDI/GUI
Electronic LSR Completion Notification via Interface
Auto-push statuses to Co-Providers
Access to multi-point Private Line Resale
Access to Designed Services PBX trunks
Access to ISDN PRI
Access to Sub-Loop
Resale Centrex – flowthrough for Western region
CSRs for Centrex in electronic format (CICMP CR 5235881)
Create notification process for LSMS system outages (CICMP CR 5043023)
Retrieval of CSR by BTN or WTN (CICMP CR 4441096)

Extend IMA hours of operation (CICMP CR 4267810). Completed prior to 6.0 but recognized as being implemented in 6.0.

Note that two of the CRs, 5043023 and 4267810, were process and not system related. Also, “Extending IMA hours of operation” was an enhancement that Qwest already planned and just happened to coincide with a CR.

Resolution

Qwest Response Summary:

At this time Qwest has requested the Description of Incident to be clarified so that we can better understand what the specific incident(s) is we need to address in our response. The due date for the official Qwest Response will be determined based on the date we receive the clarification.

Qwest Supplemental Response 4/17/2001:

Qwest disagrees with CGEY’s belief as to the degree to which the CICMP process is not collaborative. It is Qwest’s position that it is appropriate for CLECs to vote on CLEC initiated changes but is not appropriate for CLECs to vote on all changes.

The CICMP process provides for the CLECs to vote on the CLEC recommended changes that will be scheduled in the releases. Qwest also acknowledges that while CLEC requests are always part of a given release, the number of CLEC initiated changes can vary based on the following factors:

- Scope/size of the release based on the time frame and the size of changes
 - System changes associated with changes to national guidelines, e.g., OBF
 - System changes/additions required for state/federal regulatory compliance
 - System changes to increase system efficiency and/or correct problems identified by Qwest or the CLECs outside of the CICMP process
 - System changes to improve capacity, mechanization capabilities, etc.
- Many of these changes benefit both Qwest and the CLEC community by improving system capacity, capabilities, processing time frames, and Qwest’s ability to provide CLECs with “a meaningful opportunity to compete”.

An example of a recent release schedule is the 6.0 release documentation that was comprised of 37 total changes. The following is a breakdown of the changes in this release:

■ Technical – Maintenance Management of System	4
■ Center – Support CLECs	5
■ CICMP	6
■ Regulatory	14
■ New Products	8

Please note: The numbers for the 6.0 release as documented in this reply are taken directly from the 6.0 Implementation Documentation.

While the Qwest specific changes are not open for “prioritization or voting” by the CLEC community, Qwest does receive input from CLECs on changes that impact the CLECs. CLEC input is provided during CLEC initiated conference calls and the monthly CICMP meetings. CLEC input can be logged as “action items” on the Action Items log. The Action Items log is distributed to all CICMP members and posted publicly on the Qwest CICMP web site. <http://www.qwest.com/wholesale/cicmp/teammeetings.html>

As a final note, Qwest does not agree that the systems covered by the CICMP process were “designed and exist solely for the use of Qwest wholesale customers” and these “wholesale customers are the only users of these systems”. The suite of OSS systems were designed for the use and benefit of CLECs, however, these systems are also used by Qwest personnel *for the benefit of the CLECs* in processing CLEC requests for wholesale products and services.

Additionally, the CLEC system interfaces have many “back-office” systems and functions. Although these back-office systems/functions may not be “visible” to the CLECs, they are required for the benefit of processing CLEC requests and transactions. When these systems require changes that affect CLEC interfaces, these changes are communicated to the CLECs through the CICMP process.

As in any software requirements management system, Qwest will have the need to make architectural, code, or database modifications to its back-office systems from time to time due to internal requirements.

CGE&Y Supplemental Response 8/29/2001:

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest’s process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233.

Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

Qwest Supplemental Response 10/25/2001:

The re-designed Change Management Process (CMP) provides a collaborative process for making changes to CLEC-specific pre-order, order, and repair interfaces. The re-designed CMP defines four OSS Interface Change Request (CR) types. CLEC Originated and Qwest Originated OSS Interface CR types are prioritized exclusively by the CLECs. Regulatory and Industry Guideline OSS Interface CR types, which can be initiated by either a CLEC or Qwest are not subject to prioritization regardless of the source of origination. The CR types are defined in the re-designed CMP as follows:

Regulatory Change

"A Type 2 change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may initiate the change request."

**Industry Guideline Change**

"An Industry Guideline Change implements Industry Guidelines using a national implementation timeline, if any. Either Qwest or the CLEC may initiate the change request. These guidelines are industry defined by:

- Alliance for Telecommunications Industry Solutions (ATIS) Sponsored Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interface Committee (EDI)
- American National Standards Institute (ANSI)"

Qwest Originated Change

"A Qwest Originated change is originated by Qwest does not fall within the changes listed above and is within the scope of CMP."

CLEC Originated Change

"A CLEC Originated change is originated by the CLEC does not fall within the changes listed above and is within the scope of CMP."

Effective with the IMA 10.0 Release, the CLECs prioritized Qwest Originated CRs as well as CLEC originated CRs. The initial prioritization occurred during August 2001. The CLECs prioritized 4 CLEC Originated CRs and 16 Qwest Originated CRs in the top 20 CRs in the initial prioritization. The CLECs final prioritization will be completed October 2001.

CGE&Y Supplemental Response 10/30/2001:

CGE&Y believes that AZIWO1075-1 should remain open for the following reasons:

- Although CGE&Y acknowledges that the CMP re-design process is being implemented piece-meal, as different parts are agreed upon, the process is still ongoing
- The specific subjects dealt with in the CMP IWOs issued by CGE&Y - "collaborativeness" of the CR review process, the lengthy lifecycle of CRs, and the timeliness of release of final EDI design worksheets - have not all been discussed, agreed upon, and/or implemented as part of the ongoing re-design process
- The above processes are either not at a complete enough stage, or have only just been implemented, and therefore CGE&Y is not yet able to make a confident assessment of them

CGE&Y acknowledges Qwest's statements made in its 10/25/01 supplemental responses to these IWOs, but feels it premature to close them due to the reasons stated above.

**Resolution Submitted
by:**

Qwest

Date:

02/26/01 to 10/25/01

Verification of Resolution

The re-designed CMP, as it is proposed, will address and alleviate this deficiency. The original proposal from Qwest, following the base OBF 2233 document, outlined five categories of change requests:

1. Production Support Changes (i.e., "bug fixes")

2. Regulatory Changes
3. Industry Guideline Changes
4. Qwest-Initiated Changes
5. CLEC-Initiated Changes

Qwest had initially proposed that only Types 4 and 5 changes would be open for industry (i.e., CLEC) prioritization. The CLECs have since argued, justifiably, that all types, or at the very least Types 2 – 5, should be open for prioritization. Their rationale for this argument, which CGE&Y is in agreement with, is that nearly all regulatory changes, and many industry guideline changes, originate with a CLEC complaint or initiative and that they should have a say in the relative importance of these types of changes. There is also concern about the definition of a “regulatory change.” The CLECs are concerned that Qwest may interpret the term “regulatory” too broadly, and thereby needlessly place numerous change requests in a category that would exempt them from industry prioritization.

In fact, Qwest recently did classify a number of change requests as “Regulatory” that were candidates for IMA release 10.0. The CLEC community requested a conference call to discuss these requested changes, during which it was revealed that the changes were being scheduled for implementation to satisfy PID and/or Performance Assurance Plan (PAP) requirements from the Colorado PUC. The CLECs let it be known that they do not consider PID and PAP-related changes to be regulatory and exempt from industry prioritization. This issue is still being negotiated. CGE&Y does not believe that Qwest had any untoward motive in classifying these changes as “Regulatory,” but rather had a different interpretation of the term. The CMP now being what it is, however, the CLECs were able to be heard on the issue, and with some reservations Qwest seemed generally to concede the point.

Qwest expressed the concern that they need to have some way to satisfy PID and PAP requirements, and that with only one vote in the prioritization process there is the possibility that these types of CRs will consistently be prioritized “low” by the industry, thereby forcing Qwest to pay penalties enforced by the various state PAPs. The CLECs pledged that they would give all CRs equal weight, and it was further pointed out that Colorado PAP provides for penalties to be assessed against CLECs who attempt to engage in such disingenuous activities.

These issues serve to illustrate the kinds of candid discussions that are now taking place within the CMP. These issues aside, CGE&Y agrees with the CLEC position that Type 2 – 5 changes should be open for industry prioritization.

In summary, CGE&Y feels that with the collaborative nature of the re-design process, whatever agreement is reached on the subject of types of change requests and the process by which these requests are prioritized and voted upon will be satisfactory to the majority of the CLECs with representation at the Qwest CMP. CG&EY is therefore recommending closure of AZIWO 1075.

Verification completed by:	Robin Ferris	Date:	12/12/01
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AT&T Comment (12/13/01):

It is premature to close this IWO before the CMP workshop scheduled for December 17 and 18, 2001. The workshop will provide CGE&Y and the TAG with information that should be sufficient to determine whether the underlying issues remain to be resolved or whether they will be resolved.

CGE&Y Reply (01/09/02):

It is CGE&Y's opinion that with the inclusion of Qwest initiated CRs in IMA release 10.0 and the collaborative CMP re-design process currently underway, this IWO should remain closed.

TAG Recommendation

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Approved

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Return to Qwest

TAG Acceptance by:		Date:	

Test Vendor ID: IWO 1075-1
Qwest Internal Tracking ID: TI 220
Observation/IWO Title: Current CICMP Process
Test Type/Domain: Rel. Management / Robin Ferris
Date Qwest Received: 2/19/2001
Initial Response Date: 2/26/2001
Supplemental Response Date: 4/17/2001

Test Incident Summary:

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Resale Centrex – Centrex 21
Retrieve large CSRs
Pre-Order transaction: parsed CSR info (CICMP CR 4342063)
Additional lines on UBL conversion (CICMP CR 4185852)
Electronic Work Completion and Jeopardy Notification, and Manual Jeopardy Notification
Electronic FOC via IMA GUI
Electronic Reject Notification via IMA GUI
Electronic Billing Completion Notification via EDI/GUI
Electronic LSR Completion Notification via Interface
Auto-push statuses to Co-Providers
Access to multi-point Private Line Resale
Access to Designed Services PBX trunks
Access to ISDN PRI
Access to Sub-Loop
Resale Centrex – flowthrough for Western region
CSRs for Centrex in electronic format (CICMP CR 5235881)
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Note that two of the CRs, 5043023 and 4267810, were process and not system related. Also, “Extending IMA hours of operation” was an enhancement that Qwest already planned and just happened to coincide with a CR.

Qwest Response Summary:

At this time Qwest has requested the Description of Incident to be clarified so that we can better understand what the specific incident(s) is we need to address in our response. The due date for the official Qwest Response will be determined based on the date we receive the clarification.

Qwest Supplemental Response 4/17/2001:

Qwest disagrees with CGEY's belief as to the degree to which the CICMP process is not collaborative. It is Qwest's position that it is appropriate for CLECs to vote on CLEC initiated changes but is not appropriate for CLECs to vote on all changes.

The CICMP process provides for the CLECs to vote on the CLEC recommended changes that will be scheduled in the releases. Qwest also acknowledges that while CLEC requests are always part of a given release, the number of CLEC initiated changes can vary based on the following factors:

- Scope/size of the release based on the time frame and the size of changes
 - System changes associated with changes to national guidelines, e.g., OBF
 - System changes/additions required for state/federal regulatory compliance
 - System changes to increase system efficiency and/or correct problems identified by Qwest or the CLECs outside of the CICMP process
 - System changes to improve capacity, mechanization capabilities, etc.
- Many of these changes benefit both Qwest and the CLEC community by improving system capacity, capabilities, processing time frames, and Qwest's ability to provide CLECs with "a meaningful opportunity to compete".

An example of a recent release schedule is the 6.0 release documentation that was comprised of 37 total changes. The following is a breakdown of the changes in this release:

▪ Technical – Maintenance Management of System	4
▪ Center – Support CLECs	5
▪ CICMP	6
▪ Regulatory	14
▪ New Products	8

Please note: The numbers for the 6.0 release as documented in this reply are taken directly from the 6.0 Implementation Documentation.

While the Qwest specific changes are not open for "prioritization or voting" by the CLEC community, Qwest does receive input from CLECs on changes that impact the CLECs. CLEC input is provided during CLEC initiated conference calls and the monthly CICMP meetings. CLEC input can be logged as "action items" on the Action Items log. The Action Items log is distributed to all CICMP members and posted publicly on the Qwest CICMP web site. <http://www.qwest.com/wholesale/cicmp/teammeetings.html>

As a final note, Qwest does not agree that the systems covered by the CICMP process were "designed and exist solely for the use of Qwest wholesale customers" and these "wholesale customers are the only users of these systems". The suite of OSS systems were designed for the use and benefit of CLECs, however, these systems are also used by Qwest personnel *for the benefit of the CLECs* in processing CLEC requests for wholesale products and services.

Additionally, the CLEC system interfaces have many "back-office" systems and functions. Although these back-office systems/functions may not be "visible" to the CLECs, they are required for the benefit of processing CLEC requests and transactions. When these systems require changes that affect CLEC interfaces, these changes are communicated to the CLECs through the CICMP process.

As in any software requirements management system, Qwest will have the need to make architectural, code, or database modifications to its back-office systems from time to time due to internal requirements.

CGE&Y Supplemental Response 8/29/2001:

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233.



Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

Attachment(s): None

EXHIBIT E

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

IMPASSE ISSUES

28 January 2002

The following three IWOs raised an impasse in the TAG meeting held on 25 January 02.

AZIWO1075 (Master Issue #937)

AZIWO1076 (Master Issue #938)

AZIWO1078 (Master Issue #939)

These IWOs are related to the Qwest Change Management Process.

- AZIWO1075 – Current CICMP process not collaborative effort for CLECs making changes to pre-order, order, and repair interfaces.
- AZIWO1076 – CICMP CR process needs review and redesign for CRs to progress in more timely fashion.
- AZIWO1078 – Final EDI design documents release to CLECs only three weeks prior to new EDI release.

Impasse issue – IWOs should remain open until Qwest has implemented Change Management Process and evaluation has been performed to determine if the issues raised in the IWOs are remedied.

The basis for the three IWOs at issue is the Co-Provider Industry Change Management Process (CICMP) that is the documented Qwest process uses to communicate with CLECs regarding changes that are to be implemented to the Qwest OSS interfaces. A re-design and deployment of the process that will replace the CICMP was announced by Qwest in mid-year 2001, and the new process is being implemented as process components are negotiated between Qwest and the CLECs. The new process is referred to as the Change Management Process (CMP) to distinguish the new from the existing process.

The existing CICMP has not been amended to address the issues raised in the IWOs as-issued, and the IWOs at issue need to be measured against the elements of the CMP that have been agreed and implemented. To date, CGE&Y has not reviewed the

implemented CMP to determine whether the issues have been resolved. The Incident Work Order Process (Appendix I), as specified in the Test Standards Document (TSD) Version 2.10, requires CGE&Y to solicit remedies in processes, systems, and operations from Qwest for problems that CGE&Y detects in its testing. “Qwest prepares a written response to the IWO describing any intended resolution” [IWO Completion Process, #1.] For these IWOs, Qwest proposes that the CMP will provide resolutions to each of the issues raised. The CLECs are similarly hopeful that the negotiations that have been taking place and which are on-going, will be successful and that the process improvements will:

- yield a collaborative forum for introduction and implementation of changes to Qwest’s OSS interfaces (IWO 1075);
- provide for timely implementation of prioritized CLEC requests for change (IWO 1076); and,
- result in timely release of EDI specifications and “developer worksheets” (IWO 1078)

The prospective nature of these resolutions is not contemplated as a way in which IWOs can be satisfied according to Appendix I. Any resolution proposed by Qwest is to be evaluated to determine whether it resolves the underlying problem. CGE&Y cannot test to determine if a promised solution will resolve the problem, it can only test to determine if an implemented solution resolves the problem. CGE&Y has not evaluated the implemented CMP to determine that the problems that it saw when it issued these IWOs have been resolved.

Qwest's CMP has not been evaluated by an independent third party to determine whether it meets FCC guidelines for an adequate CMP. As outlined in the Common Carrier Bureau Chief's advice to U S West (now Qwest) of September 27, 1999, a Change Management Process evaluation is to demonstrate that the process provides for:

- CLEC Participation,
- Release Implementation,
- Memorialization of Process, and,
- Dispute Resolution.

Mr. Strickling's letter details features of these provisions that the Bureau recommends be part and parcel of an incumbent's CMP. The letter further advises that the CMP be assessed for its adequacy in terms of "a review of the BOC's ability to implement at least one significant software release." This assessment has not been conducted for the CMP.

It is obvious that the implementation steps are going forward, and in light of the complexity of the issues requiring resolution, are going forward in a timely fashion. The 2001 decision to announce its plans for retiring the CICMP and for re-design of the CMP was Qwest's. It knew the perspective of the CCB; it knew the FCC's views of the adequacy of the CMP's of Verizon (New York) and SBC (Texas); it knew its existing CICMP was inadequate. It cannot now complain that the process is going too slowly when the actual issue is that Qwest began the re-design too late.

During the time that CLECs were frustrated with the Qwest CICMP for exactly the reasons raised in IWOs 1075, 1076 and 1078, Qwest was going forward with its own agenda for making changes to its OSS to meet other 271 obligations, while at the same time, denying CLECs a collaborative forum for negotiating changes to the OSS (IWO

1075), timely implementation of CLEC-suggested changes; and coordinated release of EDI specifications and supporting documents.

Qwest should advise the TAG when it is prepared for a third party evaluation of its CMP, and the evaluator should perform the assessment consistent with the FCC and CCB advice; and, once completed, the assessment report should be provided to the TAG. The CMP is an important aspect of Qwest's OSS framework for 271 checklist purposes. The assessment should be undertaken as promptly as possible following Qwest's announcement that its CMP is ready for review.

:

The following three IWOs raised an impasse in the TAG meeting held on 25 January 02.

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- AZIWO1078 – Final EDI design documents release to CLECs only three weeks prior to new EDI release.

Impasse issue – IWOs should remain open until Qwest has implemented Change Management Process and evaluation has been performed to determine if issued raised in IWOs are remedied.

WORLDCOM, INC. COMMENTS

CGE&Y identified in IWO 1075-1 “the current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interface. The process, as it exists today, only addresses roughly a third of the changes that are not made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems’ primary users – the CLECs – in a collaborative effort with Qwest.”

WCom notes that Qwest original take on this deficiency came in their original response dated 4/17/01 “It is Qwest’s position that it is appropriate for CLECs to vote on CLEC initiated changes but is not appropriate for CLECs to vote on all changes”. This opinion is evident by the fact that seven (7) IMA releases were implemented prior to the existence of a Qwest change management process and upon implementation CLEC CR input to the next three releases was minimal (24%) and communication of Qwest initiated CRs was null. Thus, Qwest dictated to CLECs what software enhancements were to be implemented 76% of the time.

The FCC recognizes the need for “collaboration” in one of its factors regarding CMP, “competing carriers had substantial input in design and continued operation”. To date, there is not enough evidence to reflect that CLECs had substantial input to the CMP processes employed by Qwest yet Qwest’s initiation to “redesign” CMP is a step in the right direction.

CGE&Y "verification of resolution" on this IWO states, "The redesign CMP, as it is proposed, will address and alleviate this deficiency." CGE&Y also is reliant on the "collaborative nature of the redesign process" which does not prove that CMP is collaborative and that "competing carriers had substantial input in design and continued operation". Until such proof can be evaluated and verified by CGE&Y, this IWO is premature to close.

CGE&Y identified in IWO 1076-1 that "the change request (CR) process used in CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion...the average time it took the CRs to make it into a software release from their initiation was 12.5 months."

Although Qwest responded with asserted implemented fixes, CGE&Y states on 10/30/01 the following reasons for the IWO to remain open:

- Although CGE&Y acknowledges that the CMP re-design process is being implemented piece-meal, as different parts are agreed upon, the process is still ongoing
- The specific subjects dealt with in the CMP IWOs issued by CGE&Y – "collaborativeness" of the CR review process, the lengthy lifecycle of CRs, and the timeliness of release of the final EDI design worksheets – have not all been discussed, agreed upon, and/or implemented as part of the ongoing redesign process
- The above processes are either not at a complete enough stage, or have only just been implemented and therefore CGE&Y is not yet able to make a confident assessment of them

WCom commented on this IWO on 12/14/01 stating "Qwest states a CR initiation process has been reviewed, redesigned and implemented. What is not clear in this statement is the fact that the interim process established refers to CLEC initiated changes only. There are four types of CRs that require processes be reviewed, redesigned and implemented: Regulatory, Industry Changes, Qwest Initiated and CLEC Initiated. As well, Production CRs must have a collaboratively established process developed and implemented. These CR types must have processes implemented that allow either Qwest or CLECs to initiate the change. Thus, WCom agrees with the need to have this IWO remain open until such time that all types of CRs and the processes required for both Qwest and CLECs are established and implemented."

CGE&Y "verification of resolution" on this IWO states "In response to AZIWO1076, Qwest has implemented improvements to its current process (i.e., not the re-designed process) to address CR processing timeliness problems. The following changes have been implemented by Qwest:

- A new CR tracking database has been developed to enable CMP managers to better track the progress of CRs

- Because of the new CR tracking database, up-to-date CR reports are now available, sorted various ways, on the CMP website
- Each CR is now assigned a Project Manager so that each CR is now treated within Qwest as a Project
- A Director of Change Management is assigned so that the Change Management function within Qwest now has the requisite authority to direct the work necessary to effect the requested changes

The affect of the above changes is that CRs are now processed by Qwest and presented to the CLEC community in a much more timely manner than before. As a result, CGE&Y is recommending closure of AZIWO1076."

WCom Comment: What is not evident is that CRs are processed more timely than 12.5 months on average as originally determined by CGE&Y. As well, it is not evident what verification steps CGE&Y took to determine the asserted fixes were, in fact, implemented for both Qwest and CLEC initiated CRs and are those fixes being practices by Qwest personnel as intended. Until such time that CGE&Y can provide the evidence that CRs are processed more timely, WCom believes this IWO was closed pre-maturely.

CGE&Y issued IWO 1078 stating "'Final" EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors."

Qwest 10/25/01 response "As part of the Change Management Process (CMP) re-design, Qwest has proposed to implement the following schedule effective with the IMA 10.0 Release." Currently, IMA version 10.0 is due out June/02.

Per CGE&Y "verification of resolution" "the release of EDI design documents is a topic that is being negotiated through the CMP redesign effort. At the beginning of the process Qwest proposed that it would adhere to the OBF 2233 proposal which calls for the release of draft design documentation 66 calendar days prior to a release and final documentation 45 calendar days prior. This topic has not reached a consensus state among the core re-design team, but CGE&Y considers the OBF proposal to be a reasonable timeframe in which to release draft and final design documentation.

Because of the collaborative nature of the re-design process CGE&Y expects that whatever decision is reached as to the timeliness of EDI documentation releases will have been accepted by the majority of the CLEC community. As a result, CGE&Y is recommending closure of AZIWO1078."

WCom Comment: It was premature for CGE&Y to close this IWO for the following: 1) Evidence must be provided by Qwest, not OBF, that "final" EDI design documentation are released in a timely manner.

2) Qwest proposed implementation begins with 10.0 which is not due out until June/02. Thus, in order to validate the proposed schedule is adhered to, CGE&Y would need to verify against Qwest IMA 10.0 release schedule.

EXHIBIT F

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

Test Vendor ID: EXP 2003
Qwest Internal Tracking ID: TI 281
Observation/Exception Title: Release Schedule Incomplete
Test Type/Domain: Relationship Management
Date Qwest Received: 03/29/2001
Initial Response Date: 04/12/2001
Supplemental Response Date: 06/28/2001
2nd Supplemental Response Date: 12/21/2001
3rd Supplemental Response Date: 02/12/2002

Test Incident Summary:

An exception has been identified as a result of the test activities of the pseudo-CLEC.

Exception:

Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.

Background:

When implementing a new IMA EDI release, Qwest makes available a series of documents to co-providers to assist them in their certification and implementation efforts. Qwest's Co-provider Industry Change Management Process (CICMP) organization handles the process of tracking releases and notifying co-providers of release information and schedules. Qwest develops the scheduling of IMA releases internally, and posts the targeted timeline of release dates in a calendar on the CICMP web page.

During the P-CLEC's EDI implementation kick-off meeting, Qwest did not provide details relative to the process by which it plans and schedules EDI releases. However, the P-CLEC presumes that the CICMP calendar is based upon the IMA Matrix in Qwest's Release Notification Enhancement document found on the CICMP web page.¹

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest has not followed its established release timeline. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues.

The attached spreadsheet provides a comparison between Qwest's expected release timeline, as defined in the IMA Matrix,² the CICMP calendar's posted release notification delivery dates, and the actual dates that the P-CLEC received Qwest release notifications. As the attachment shows, on many occasions, Qwest delivered release notifications late. Specifically, Qwest published the Release 6.0 Recertification Notice on the same day it released IMA 6.0, three weeks after its projected delivery date. Qwest's Release Notes

¹ http://www.qwest.com/wholesale/downloads/enhancement_120600.ppt.

² The projected release timeline was determined by counting backward the number of days or weeks stated in the IMA Matrix from Qwest's stated target release dates of December 11, 2000 for Release 6.0 and February 26, 2001 for Release 6.01.

Descriptions, which should have been delivered six weeks prior to the target release date, on October 11, 2000, were not received by the P-CLEC until October 27, 2000.

Further, when Qwest provides release notifications to the co-provider community, it does not always provide complete and accurate information. For example, though Qwest published the Release 6.0 Baseline Candidates only one day after the date listed on the CICMP calendar – and approximately three weeks earlier than the projected delivery date based on the IMA Matrix timeline – Qwest had to release a clarification to the Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date, and nearly two weeks after the IMA Matrix-defined projected delivery date. Qwest also released two addenda to its EDI Release 6.0 Disclosure Documents. These addenda were published after the release of IMA 6.0 to correct errors in the original Disclosure Documents. The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the P-CLEC found the analysis of the change summaries to be confusing due to a lack of clarity as to how to incorporate the content in the second disclosure document addendum. Specifically, it was not evident whether the second addendum was inclusive of the changes noted in the first addendum. Qwest does not provide a documented process that details how a co-provider should implement changes noted in the disclosure document addenda.

Issue:

Because Qwest has not adhered to its stated implementation timeline, co-providers have not been afforded adequate time to prepare for implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts.

Further, the incomplete nature of Qwest's release notifications further complicate co-providers' certification efforts by forcing co-providers to work with continually changing documentation. Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Impact:

If Qwest does not meet its established timelines for the publishing of IMA EDI release documentation, co-providers will not be able to make a smooth transition from their current EDI release to a new release. Further, multiple and frequent changes to release documentation causes co-providers to expend additional time and resources on release documentation that is not necessarily complete or accurate. These frequent and voluminous changes to release specifications will lead to the failure of co-providers' implementation efforts, and will, ultimately, delay co-providers from entering into production in a new release and executing their business plans.

Qwest Response Summary:

Qwest has fully researched the issues outlined in this Exception and does not believe it constitutes a problem.

During the project initiation discussion Qwest and the CLEC determine objectives and scope of the implementation, the time frames, and the EDI interface release against which implementation will be performed. Qwest provides a timeline of when Release Notifications were and will be published and made available to the CLEC. Qwest believes that this process currently adequately addresses the implementation planning and scheduling activities.

All pertinent information is published by Qwest through the CICMP process and in interactions with the CLEC, which includes a calendar on the CICMP web page, Release Notifications, and other documents. While it is Qwest's utmost desire to meet or exceed all published target dates, it is noted that all proposed

IMA release dates are only targets and changes may occur during an IMA release life cycle that impacts these target dates. Should changes occur, Qwest will update its target dates and communicate this to the co-provider.

With respect to the timing around re-certification, it should be noted that during the conversion to a new IMA EDI Release, it is the CLEC that initiates the beginning of the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

HP Comments 05/14/01:

As documented in the Exception, Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts. Further, Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Discussion

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest did not follow its established release timeline, as posted on the CICMP website calendar. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. In the Exception, the P-CLEC provided a table comparing the targeted release dates of IMA 6.0 Release Notifications, and the actual dates on which the release notifications were distributed by Qwest. Among the late release notifications, Qwest provided the 6.0 Recertification Notice on the same day Release 6.0 was implemented and three weeks after the projected delivery date. Further, this Exception noted that Qwest release notifications do not always provide complete and accurate information. As examples, the Exception cited Qwest's release of a clarification to the Release 6.0 Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date (July 20, 2000) and the release of the initial Baseline Candidates notification (July 21, 2000). The Exception also reported that Qwest had to release two addenda to its EDI Release 6.0 Disclosure Documents, published after the release of IMA 6.0 to correct errors in the original Disclosure Documents. The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the analysis of the change summaries was confusing because it was not evident whether the second addendum was inclusive or exclusive of the changes noted in the first addendum. This confusion is compounded by the fact that Qwest does not provide a documented process that details how a co-provider should implement changes noted in Disclosure Document addenda. In Qwest's response to the cited issues, it indicated that it does not believe this Exception documents a problem with its systems or processes. Qwest indicated that, during the EDI implementation process with a co-provider, Qwest provides a timeline of when Release Notifications were and will be published and made available to the co-provider, and stated it believes this process adequately addresses the necessary implementation planning and scheduling activities. Qwest noted that, while it is desirable to meet or exceed all published target release dates, there is a notice on the CICMP Release Calendar that all proposed IMA release dates are only targets and changes may occur during an IMA release life cycle that impact these target dates. Should changes occur, Qwest stated it would update its target dates and communicate this to the co-provider.

With respect to the Exception's use of the delayed IMA 6.0 Re-certification Notice, Qwest indicated that, during the conversion to a new IMA EDI Release, it is the co-provider's responsibility to initiate the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy

and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

Recommendation

HP does not believe that Qwest has fully addressed the issues raised in this Exception. First, while Qwest notes that its published target release dates may change during the life cycle of an IMA release, Qwest has not addressed the impact that such delays have on a co-provider's ability to accommodate and plan for new release implementations on a shortened timeframe. Co-providers plan their release implementations based on the release calendar provided by Qwest. If a co-provider cannot be assured that targeted release dates will be met, it will have difficulty coordinating the necessary resources to implement the new release. Further, when a documentation release is delayed, co-providers must alter their development and implementation plans to ensure that the appropriate resources are available to complete the necessary review and development in the shortened timeframe.

Second, Qwest indicated in its response that the co-provider is responsible for initiating the migration process to a new release, and that, consequently, its publishing of the IMA 6.0 Re-certification Notice three weeks behind schedule, and on the same date IMA Release 6.0 was implemented, does not constitute a problem. While HP accepts that the co-provider may be responsible for initiating migration to a new IMA release, this does not remove from Qwest the responsibility to notify co-providers in a timely manner that re-certification and migration plans need to be developed. The Re-certification Notice is important to co-providers in their planning for the migration process in that it provides the timeframes in which re-certification must be completed.

Third, in addition to Qwest's delayed publishing of Release Notifications, this Exception also addressed the issue of Qwest's frequent re-release of Release Notices and Disclosure Documentation. As was documented in the Exception, when Qwest releases addenda to its documentation, co-providers are forced to develop their interfaces in a piece-meal fashion and often have to re-code their EDI maps to account for changes to Qwest's business rules specifications. This requires co-providers to devote additional time and resources to the development and implementation of new IMA releases. In its response, Qwest did not address this deficiency in its release change management process.

HP recommends that this Exception remain open pending the outcome of the current ROC TAG review of proposed Change Management Performance Indicator Definitions (PIDs). Of the Change Management PIDs under consideration, this Exception directly correlates to "PO-16 Timely Release Notifications," proposed by Qwest and "RQ-3 Release Quality," proposed by the co-provider community. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards.

Further, HP requests clarification with regard to the multiple releases of Disclosure Document addenda and release notifications cited in this Exception, as these multiple releases have a significant effect on the quality and reliability of an IMA EDI Release, and impact a co-provider's ability to plan, develop, test and implement its EDI interface. The attached table, identifying the multiple revisions and addenda to the IMA Release 6.0 Disclosure Documents, shows the magnitude of this impact on co-providers.

Qwest Supplemental Response to HP Comments (06/28/2001):

Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions. To this end, Qwest is working this issue in the regulatory workshops and the CICMP Forum and has prepared a proposal for collaborative development of a change management program that will address the concerns raised in this and other observations. The details of the program will be collaboratively refined with the CLECs in the Qwest CICMP forum. Qwest has identified and expects the program to contain the following elements, some of which address the issues raised in this observation. For example:

- On a quarterly basis, Qwest would begin sharing with Co-Providers its 12-Month Development View (View) that includes all proposals that impact Co-Providers—those initiated by Qwest and Co-Providers. Co-Providers would then have an opportunity to provide Qwest with input to the development plan.
- Qwest proposes to improve its application-to-application notification process to meet the requirements proposed by the industry's Ordering and Billing Forum (OBF) with Issue 2233. Qwest proposes to incorporate into the CICMP Qwest initiated CRs which impact Co-Providers, classify and prioritize CRs by severity type and collaborate with CLECs to develop system releases that include and meet regulatory, system and CLEC requirements.
- In addition, Qwest's proposal will include guidelines and procedures for:
 - Escalations/Expedites of changes
 - New and/or Retired Interfaces
 - Change notification for Products/Processes

Qwest believes that this comprehensive and collaborative approach to change management will address these issues and align Qwest with the direction the industry is taking with change management. Additional information/details will be available once the work in regulatory workshops and with the CLECs has concluded.

Qwest is in ongoing negotiations with the ROC TAG to arrive at agreement on two Change Management Performance Indicator Definitions (PIDs). The Change Management PIDs under consideration include "PO-16 Timely Release Notifications," and "GA-7 Software Outage Resolution". A meeting was held June 20th to review the latest drafts of these proposed PIDs. In that meeting tentative agreement was reached on PO-16. Formal TAG approval is expected in the June 28th TAG meeting. Qwest needs to provide a response to two outstanding issues on GA-7 and expects approval upon satisfactory resolution of these two issues. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards. Qwest does not support the third Change Management PID, "RQ-3 Release Quality," proposed by the co-provider community. This PID proposal is at impasse and under review by the ROC Steering Committee.

HP Supplemental Recommendation (12/21/2001):

HP agrees with Qwest's proposal in their Supplemental Response dated 6/28/2001:

"Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions."

Due to the nature of the complexity of the solution to this Exception and the length of time it will take for Qwest to implement, HP recommends that this Exception remain open pending the successful implementation of the changed CICMP process.

Based on Qwest's Agenda provided for the July 11th, 2001 "CLEC/Qwest working session to modify the Change Management Process", there will be a timeline adapted for proposal review with the CLEC community.

And further based on the outcome of the timeline development, HP will provide an update to this Exception recommendation on a quarterly basis.

Qwest Focus O&E Supplemental Response (12/21/2001):

Qwest held a call on December 13 with HP to clarify remaining questions in order to close this observation. Qwest will proceed to answer the remaining questions listed below from this call.

1. Has Qwest addressed the impact that changes to published target release dates during the life cycle of an IMA release have on a co-provider's ability to accommodate and plan for a new release implementations on a shortened timeframe?

Qwest Response: Qwest has addressed the impact that changes to published target release dates have on a CLEC's ability to accommodate and plan for a new release. In the CMP Redesign effort, Qwest and CLECs have collaboratively developed language governing IMA-EDI releases. This language is included in the *Changes to Existing OSS Interfaces* section of the *Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 12-10-01* (<http://www.qwest.com/wholesale/cmp/redesign.html>). This section details how Qwest will follow a 73-calendar day timeframe, beginning with the publication of draft technical specifications, similar to the timeline outlined in the proposed Ordering and Billing Forum (OBF) guidelines. Qwest will begin implementation of this timeline and language beginning with IMA-EDI release 10.0.

2. Has Qwest addressed requirements for Re-certification Notice to co-providers that re-certification and migration plans need to be developed? Timeframe requirements? Content requirements?

Qwest Response: The CMP Redesign team, along with Qwest, is negotiating refined language to the existing certification and re-certification processes, including discussion of migration test planning, content, and timeframes. Qwest has provided the Redesign Team with proposed language addressing these subjects. The Redesign Team will address these issues at the January 22, 23, and 24 Redesign session.

3. Has Qwest addressed issues with regard to the multiple releases of Disclosure Document addenda and release notification releases?

Qwest Response: Qwest will propose language on January 18, 2002, that will address the CLEC's concerns regarding multiple changes to Disclosure Documentation in a post production environment that require changes to CLEC's systems. Addendum language will be discussed and potentially agreed upon during the January 22, 23, and 24 Redesign session.

4. Has Qwest addressed deficiencies in its release change management process related to Qwest's release of addenda to its documentation?

Qwest Response: See Qwest's response to #3 above.

HP 2nd Supplemental Recommendation (January 11, 2002):

Qwest's responses to Questions #2 and #3 indicate that the CMP Re-Design Core Team will be reviewing proposals related to the resolution of the Exception during the January 22-24 redesign meetings. Also, Qwest indicates in its response to Question #3 that it has not yet completed the proposed draft language or provided it to the redesign team. This proposed language, according to Qwest, will be available on January 18, 2002.

In order to ensure that the language proposed by Qwest, and reviewed by the CMP Re-Design team, addresses the open issues of this Exception, HP requests the following:

1. *Qwest provide HP with copies of the proposed language, referenced in its responses to Question #2 and #3 above, that have been, or will be, provided to the CMP Re-Design Core Team for discussion in the January 22-24 redesign meetings; and*

2. Qwest provide HP with a summary of the discussions, and any decisions made, during the January 22-24 redesign meetings on the points that apply to the answers provided in this response.

HP will continue to monitor this Exception by means of a re-test (Category 4) and will provide a supplemental response after the above requests have been satisfied and completed.

Qwest Response to HP Second Supplemental Recommendation (February 12, 2002):

Qwest has reviewed HP's request and is providing the following information and documentation in response to items 1 and 2 above.

1) Qwest [to] provide HP with copies of the proposed language, referenced in its responses to Question #2 and #3 above, that have been, or will be, provided to the CMP Re-Design Core Team for discussion in the January 22-24 redesign meetings;

Qwest has attached the two documents that outline the proposed language for Disclosure addenda (Attachment 1) and Certification/Re-certification (Attachment 2). Certification/Re-certification language was discussed and inserted into the "Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 02-07-02" at the February 5-7 CMP Redesign session. Section 10.1 of the agreed Certification/Re-certification language, which is included in Attachment 2, addresses test planning, content, and timeframes. Qwest's disclosure addendum proposal has not been discussed to date.

2) Qwest provide HP with a summary of the discussions, and any decisions made, during the January 22-24 redesign meetings on the points that apply to the answers provided in this response.

Qwest proposed that both of the items described above be covered in the January 22-24 Redesign session. See the agenda mailed to attendees with the appropriate highlights (Attachment 3). Unfortunately, many issues were not addressed due to extended discussions on some issues. Certification/Re-certification language was discussed and inserted into the "Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 02-07-02" at the February 5-7 CMP Redesign session. Qwest disclosure addendum proposal has not been discussed to date.

Attachment(s): ROC_TI281_EXP2003_Attachment_1_02_12_02.doc,
ROC_TI281_EXP2003_Attachment_2_02_12_02.doc,
ROC_TI281_EXP2003_Attachment_3_02_12_02.doc

ATTACHMENT 1

Action Item 217 Redesign Issues Actions Log - **QWEST PROPOSED LANGUAGE DISCLOSURE DOCUMENT ADDENDA-**

Following is a high level overview of the current disclosure, release and addendum process:

- Draft Developer Worksheets -- 45 days prior to a release the draft Developer Worksheets are made available to the CLEC's.
- Final Disclosure – 5 weeks prior to a release the Final Disclosure documents, including I charts and developer worksheets are made available to the CLECs.
- Release Day – On release day only those CLECs using the IMA GUI are required to cut over to the new release.
- 1st Addendum – 2 weeks after the release the 1st addendum is sent to the CLECs.
- Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the release as needed. There is no current process and timeline.
- EDI CLECs – 6 months after the release those CLECs using EDI are required to cut over to the new release. CLECs are not required to support all new releases.

ATTACHMENT 2

Certification and Recertification Testing – Agreed to Language inserted into the “Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 02-07-02” at the Feb 5-7 CMP Redesign session.

[Redesign 02-06-02]

10.0 APPLICATION-TO-APPLICATION INTERFACE TESTING

If CLEC is using an application-to-application interface, CLEC must work with Qwest to certify the business scenarios that CLEC will be using in order to ensure successful transaction processing in production. If multiple CLECs are using a service bureau provider, the service bureau provider need only be certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be certified. Qwest and CLEC shall mutually agree to the business scenarios for which CLEC requires certification. Certification will be granted for the specified release of the application-to-application interface. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel if technically feasible.

New releases of the application-to-application interface may require re-certification of some or all business scenarios. A determination as to the need for re-certification will be made by the Qwest coordinator in conjunction with the release manager of each release. Notice of the need for re-certification will be provided to CLEC as the new release is implemented. The suite of re-certification test scenarios will be provided to CLEC with the initial and final Technical Specifications. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel, if technically feasible. If multiple CLECs are using a service bureau provider, the service bureau provider need only be re-certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified.

Qwest provides a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, order, and maintenance/repair. The CTE will be developed for each major release and updated for each point release that has changes that were disclosed but not implemented as part of the major release. Qwest will provide test files for batch/file interfaces (e.g. billing). The CTE for Pre-order and Order currently includes:

- Stand Alone Test Environment (SATE)
- Interoperability Testing
- Controlled Production Testing

The CTE for Maintenance and Repair currently includes:

- CMIP Interface Test Environment (MEDIACC)

Qwest provides initial implementation testing, and migration testing (from one version to the next) for all types of OSS Interface change requests. Controlled Production Testing is also provided for Pre-Order and Order. Such testing provides the opportunity to test

the code associated with those OSS Interface exchange requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality.

10.1 Testing Process

Qwest will send an industry notification, including testing schedules (see Section 5.0 – Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest must participate in at least one joint planning session and determine:

- Connectivity (required)
- Firewall and Protocol Testing (required)
- Controlled Production (required)
- Production Turn-up (required)
- Test Schedule (required)

A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:

- Requirements Review
- Test Data Development
- Progression Testing Phase

Qwest will communicate any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to the CTE.

Provided a CLEC uses the same software components and similar connectivity configuration as it uses in production, the CLEC should, in general, experience response times similar to production. However, this environment is not intended for volume testing. The CTE contains the appropriate applications for pre-ordering and Local Service Request (LSR) ordering up to but not including the service order processor. Qwest intends to include the service order processor as part of the SATE component of the CTE by the end of 2002. Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 11.0.

ATTACHMENT 3

Announcement Date: January 17, 2002
Effective Date: January 22, 2002
Document Number: GENL.
Notification Category: General
Target Audience: CLECs, Resellers

Subject: Agendas for the January 22 through January 24, 2002 Qwest-CLEC
Working
Session to Modify the Change Management Process

The agendas for the next Change Management Process Re-design working session with the Core Team are attached for your reference.

Date: Tuesday, January 22; Wednesday, January 23; and Thursday, January 24, 2002

Locations: 1801 California Street, 23rd Floor, Executive Conference Room, Denver, CO

Time: 10 AM to 5 PM Mountain Time (January 22 with a working lunch)
9 AM to 5 PM Mountain Time (January 23 and January 24)

Conference Bridge: Dial-In Number: 877.550.8686
Conference ID: 2213337#

The agendas along with meeting material will be emailed to you and posted on the web site by January 18: <http://www.qwest.com/wholesale/cmp/redesign.html>.

Sincerely,

Qwest

MEETING MATERIAL

- CMP Redesign Meeting January 22 - 24 Notice and Agenda – 01-14-02
- CMP Re-Design Core Team Issues and Action Items Log – 01-14-02
- CMP Re-design Discussion Running List – 01-08-01
- Changes that DO NOT Alter CLEC Operating Procedures – 01-15-02
- Change Management Process (CMP) Improvements - 11-26-01
- Qwest CMP Improvement Process - 11-26-01
- Qwest Proposed History Change Log - Revised 12-20-01
- Qwest Proposed CR Prioritization Language - Revised 12-6-01
- SCRP Proposed Language - 12-10-01
- ~~Certification and Re-Certification Testing - 12-11-01~~
- Qwest Proposed Interface Testing Language - Revised 11-27-01
- AT&T Interface Testing Issues – 12-03-01
- Changes Resulting from New Production Support Language - 01-16-02
- Qwest-CLEC Technical Issues Escalation - January 16, 2002
- CLEC Open cases 0101 to 01022 - 01-10-02
- Updated Event Notification Form - 01-16-02
- Qwest Proposed TERMS Language - 01-08-02
- Qwest Proposed Action Item Language - 01-14-02
- Qwest Proposed Managing the CMP Language - Revised 11-20-01
- Combined CMP Redesign Gap Analysis – 01-17-02
- AT&T CMP Redesign Gap Analysis Addition - 01-14-02
- AT&T CMP Redesign Gap Analysis - 01-11-02
- Covad CMP Redesign Gap Analysis - 01-11-02
- Eschelon CMP Redesign Gap Analysis - 01-11-02
- WorldCom CMP Redesign Gap Analysis - 01-11-02
- Facilitator CMP Redesign Gap Analysis – 01-11-02
- Schedule of CMP Redesign Working Sessions - Revised 12-11-01
- Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 01-03-02
- System Event Notification Subscription Announcement – Published 06-01-01
- Excerpt from Schultz E-mail - Action Item 198

Tuesday, January 22, 2002 (10 am to 5 pm Mountain Time)

Wednesday, January 23 and Thursday, January 24, 2002 (9 am to 5 pm Mountain Time)

1801 California Street, 23rd Floor, Executive Conference Room, Denver, CO

Conference Bridge: 1-877-550-8686 Conference ID: 2213337 (hit #)

AGENDA—Tuesday, January 22

TOPIC

Introduction (10:00 am – 10:15 am MT)

LEAD

Judy Schultz,

Qwest

- Take attendance
Facilitator
- Review Agenda

Judy Lee,

Discussion and Status (10:15 am – 4:45 pm MT)

All

10:15 am – Noon (including a 10-minute break)

- Discuss and develop guidelines for “What is not CLEC-impacting” for Product/Process
- Read-out on Interim Product/Process Change Process Implementation
- PCAT and Tech Pub Documentation and History Change Log (**Betty Heid, Sue McNa**)
CLECs want the version number at the front of the document (#199)
 - Identify existing documentation version control tools (#200)
 - How will the history change log work with the holding tank documents (#201)
 - Review Historical Change Log document and determine implementation date (#202)
 - Provide a drop down list for the PCAT topical section (#203)
 - How will Qwest insure that the dot changes and holding tank changes get updated on the operational version? (#204)
 - Implementation of interim document review process (#70)

Noon to 12:30 pm Pick up Lunch

12:30 pm – 4:45 pm (including a 10-minute break)

All

- (Continue from morning discussions, if needed)
- Prioritization Process
 - Qwest position on prioritizing Regulatory changes (#167, 171, 181, 195)
 - Qwest position on prioritizing Industry Guideline changes (#168)
 - What is the process for an exception item during Prioritization? (#93)
 - Will a new OSS Interface CR go through prioritization? (#149)
 - Is prioritization on a per OSS basis? (#150)
 - Review LOE process to see if additional changes need to be made;
Criteria used to determine ‘level of effort’ (Action item # 146, 214) (**Teresa Jacobs**)
 - Can a CLEC prioritize/rank OSS interface CR candidates, even if the CLEC is not using the interface? (COIL-WCom)
 - Attach the latest ranking form, sample of candidate list, and tabulation form (#174)

- Provide a decision on whether to provide copies of documentation regarding prioritization and sizing (#196)
- Review proposal on Special Change Request Process (SCRCP)
- If necessary, revisit Types of Changes (related to Prioritization discussion on Regulatory and Industry Guidelines #169)
- Interface Testing
 - Review language for certification/re-certification (#186; consider same language for Changes to An Existing OSS Interface)
 - Define process for addressing non-production support problems that occur during Interface Testing; and address the process when a production code problem is found in the test environment. (#208)
 - ATT Interface Testing Issues (Mitch Menezes)

Tuesday, January 22, 2002 (10 am to 5 pm Mountain Time)

Wednesday, January 23 and Thursday, January 24, 2002 (9 am to 5 pm Mountain Time)

1801 California Street, 23rd Floor, Executive Conference Room, Denver, CO

Conference Bridge: 1-877-550-8686 Conference ID: 2213337 (hit #)

AGENDA—Wednesday, January 23

TOPIC

Introduction (9:00 am – 9:15 am MT)

Qwest

- Take attendance
Facilitator

LEAD

Judy Schultz,

Judy Lee,

Discussion and Status (9:15 am – 4:45 pm MT)

All

(including a 10-minute morning and afternoon Break and an hour Lunch)

- Continue from previous day discussion, if needed
- Discuss and close on Master Redline Language for following Issues and Action

Items:

– **OSS Interface CR Initiation Process**

- Proprietary CR and
- Comments/Concerns (#88, 89)
- Criteria for a Deny CR
- (#118)
- Qwest-initiated OSS
- Interface CRs (#148)
- CRs that impact both an
- OSS Interface and Process (#163)
- Review Qwest proposed
- language on the content of the Regulatory and industry guideline CR (Action
- item # 212)
- Develop a process to
- debate whether a CR is a regulatory and industry guideline change (Action item #
- 213)
- Address how the CMP
- will handle similar CRs and a housekeeping method for old CRs (#224)
- Review Walk-on CR
- language for CMP meeting (ATT Issues List #6)
- Review and close on
- CLEC Comments in the Master Redline framework
- Provide the end-to-end
- development life cycle and time interval for Systems (#197)

– **Changes to An Existing OSS Interface Elements**

- “Draft” industry
- guideline changes (#94)
- Define changes to an
- OSS interface that may not require a CLEC to make coding changes, but may
- affect CLEC process or operations. (#137)

- Maximum of major releases per calendar year per OSS, other than IMA (#139)
- What is included in Technical Specifications (#141)
- CR Initiation Process takes place before Changes to An Existing (#142);
 - Discuss and clarify in the Master Redline that CRs precede any changes (change, introduction, and retirement of OSS Interface) within the scope of CMP (exceptions? production support?) (AT&T Issue List #14)
- Is the EDI Implementation Guideline under the scope of CMP? (#143)
- We need to talk about addenda to release software and documentation. How is it done? How is it communicated? How is it documented? Are CLECs ever consulted? (Action item #217; ATT Issues List #15) (Jeff Thompson)
- Review and close on CLEC Comments in the Master Redline framework

- **Introduction of A New OSS Interface**
 - o Review and close on CLEC Comments in the Master Redline framework
 - o Close on timeline Note language (#140) and business days vs. calendar days timeline
- **Retirement of Existing OSS Interfaces**
 - o Review and close on CLEC Comments in the Master Redline framework
- **Production Support (Teresa Jacobs)**
 - o Event notification
 - o subscription process (#205)
 - o Determine
 - o implementation date for production support (#210)
 - o Examples of IT Help
 - o Desk Trouble Tickets (#211)
- **Escalation Process**
 - o Define an escalation process for technical production problems for both CLECs and Qwest (#189)
- **Exception Process**
 - o Review the Exception process: what constitutes an exception for Systems, Product & Process and overall (#93), and action item # 126 and 215 (ATT Issues List #7).
- **Administration**
 - o Re-visit the CMP Web Site (#13G)
 - o Timeframe and method that Qwest provides a notice on a CR response and post on web site (#145, 156)
- **Managing the CMP**
 - o Roles of representatives (#107, 172)
 - o AT&T Issue List # 13: Has there been a discussion yet of what happens at the end of redesign? Do we all review the Master Redline and provide comments and get to where we say it is done (is this a vote)? Is there a process to send the whole thing to the entire CMP body? Once it goes to the CMP body, will there be a walk through of the document with time for questions/comments? Is there a vote at the CMP body? (#177, 178)
- **Introduction and Scope**
 - o Timelines under the CMP are 'defaults' (#153)
- **Terms** (#106, 133, 162, 182)
- **Scheduled Maintenance for OSS Interface** (#209)
- **Training** (#152)
- Discuss and close other items from the Issues and Action Items Log
- **Are Call Center outages included in the "outages" sub-category?** (#40)

- **Network outage notification process (#42)**
- **Differences due to geography (#187)**
- **Send out and discuss affinity between 25001 and 30623 (#193)**
- **Provide an explanation for regulatory number pooling CR (#194)**

Adjourn

Tuesday, January 22, 2002 (10 am to 5 pm Mountain Time)

Wednesday, January 23 and Thursday, January 24, 2002 (9 am to 5 pm Mountain Time)

1801 California Street, 23rd Floor, Executive Conference Room, Denver, CO

Conference Bridge: 1-877-550-8686 Conference ID: 2213337 (hit #)

AGENDA—Thursday, January 24

TOPIC

LEAD

Introduction (9:00 am – 9:15 am MT)

Judy Schultz,

Qwest

- Take attendance

Judy Lee,

Facilitator

Discussion and Status (9:15 am – 4:30 pm MT)

All

(including 10-minute morning and afternoon breaks and an hour lunch)

- Continue from previous day discussion, if needed
- Gap Analysis Discussion and determine future session topics
- Read out from Arizona Workshops
- Review Schedule of Future Working Session along with topics
- Discuss and close on additional issues and actions from this 3-day session

Next Meeting (4:30 pm to 5:00 pm MT)

All

- Determine discussion items and material needed for the next session

Adjourn

MEMORANDUM

DATE: July 13, 2001
TO: ROC TAG
FROM: Martha McMillin, Hewlett-Packard Consulting
RE: Qwest Supplemental Response to Exception 2003

Summary

As documented in the Exception, Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts. Further, Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Discussion

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest did not follow its established release timeline, as posted on the CICMP website calendar. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. In the Exception, the P-CLEC provided a table comparing the targeted release dates of IMA 6.0 Release Notifications, and the actual dates on which the release notifications were distributed by Qwest. Among the late release notifications, Qwest provided the 6.0 Recertification Notice on the same day Release 6.0 was implemented and three weeks after the projected delivery date.

Further, this Exception noted that Qwest release notifications do not always provide complete and accurate information. As examples, the Exception cited Qwest's release of a clarification to the Release 6.0 Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date (July 20, 2000) and the release of the initial Baseline Candidates notification (July 21, 2000). The Exception also reported that Qwest had to release two addenda to its EDI Release 6.0 Disclosure Documents, published after the release of IMA 6.0 to correct errors in the original Disclosure Documents.

The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the analysis of the change summaries was confusing because it was not evident whether the second addendum was inclusive or exclusive of the changes noted in the first addendum. This confusion is compounded by the fact that Qwest does not provide a documented

process that details how a co-provider should implement changes noted in Disclosure Document addenda.

In Qwest's response to the cited issues, it indicated that it does not believe this Exception documents a problem with its systems or processes. Qwest indicated that, during the EDI implementation process with a co-provider, Qwest provides a timeline of when Release Notifications were and will be published and made available to the co-provider, and stated it believes this process adequately addresses the necessary implementation planning and scheduling activities. Qwest noted that, while it is desirable to meet or exceed all published target release dates, there is a notice on the CICMP Release Calendar that all proposed IMA release dates are only targets and changes may occur during an IMA release life cycle that impact these target dates. Should changes occur, Qwest stated it would update its target dates and communicate this to the co-provider.

With respect to the Exception's use of the delayed IMA 6.0 Re-certification Notice, Qwest indicated that, during the conversion to a new IMA EDI Release, it is the co-provider's responsibility to initiate the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

Recommendation

HP does not believe that Qwest has fully addressed the issues raised in this Exception. First, while Qwest notes that its published target release dates may change during the life cycle of an IMA release, Qwest has not addressed the impact that such delays have on a co-provider's ability to accommodate and plan for new release implementations on a shortened timeframe. Co-providers plan their release implementations based on the release calendar provided by Qwest. If a co-provider cannot be assured that targeted release dates will be met, it will have difficulty coordinating the necessary resources to implement the new release. Further, when a documentation release is delayed, co-providers must alter their development and implementation plans to ensure that the appropriate resources are available to complete the necessary review and development in the shortened timeframe.

Second, Qwest indicated in its response that the co-provider is responsible for initiating the migration process to a new release, and that, consequently, its publishing of the IMA 6.0 Re-certification Notice three weeks behind schedule, and on the same date IMA Release 6.0 was implemented, does not constitute a problem. While HP accepts that the co-provider may be responsible for initiating migration to a new IMA release, this does not remove from Qwest the responsibility to notify co-providers in a timely manner that re-certification and migration plans need to be developed. The Re-certification Notice is important to co-providers in their planning for the migration process in that it provides the timeframes in which re-certification must be completed.

Third, in addition to Qwest's delayed publishing of Release Notifications, this Exception also addressed the issue of Qwest's frequent re-release of Release Notices and Disclosure Documentation. As was documented in the Exception, when Qwest

releases addenda to its documentation, co-providers are forced to develop their interfaces in a piece-meal fashion and often have to re-code their EDI maps to account for changes to Qwest's business rules specifications. This requires co-providers to devote additional time and resources to the development and implementation of new IMA releases. In its response, Qwest did not address this deficiency in its release change management process.

HP recommends that this Exception remain open pending the outcome of the current ROC TAG review of proposed Change Management Performance Indicator Definitions (PIDs). Of the Change Management PIDs under consideration, this Exception directly correlates to "PO-16 Timely Release Notifications," proposed by Qwest and "RQ-3 Release Quality," proposed by the co-provider community. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards.

Further, HP requests clarification with regard to the multiple releases of Disclosure Document addenda and release notifications cited in this Exception, as these multiple releases have a significant effect on the quality and reliability of an IMA EDI Release, and impact a co-provider's ability to plan, develop, test and implement its EDI interface. The attached table¹, identifying the multiple revisions and addenda to the IMA Release 6.0 Disclosure Documents, shows the magnitude of this impact on co-providers.

Qwest Supplemental Response to HP Comments (June 28, 2001):

Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions. To this end, Qwest is working this issue in the regulatory workshops and the CICMP Forum and has prepared a proposal for collaborative development of a change management program that will address the concerns raised in this and other observations. The details of the program will be collaboratively refined with the CLECs in the Qwest CICMP forum. Qwest has identified and expects the program to contain the following elements, some of which address the issues raised in this observation. For example:

- On a quarterly basis, Qwest would begin sharing with Co-Providers its 12-Month Development View (View) that includes all proposals that impact Co-Providers—those initiated by Qwest and Co-Providers. Co-Providers would then have an opportunity to provide Qwest with input to the development plan.
- Qwest proposes to improve its application-to-application notification process to meet the requirements proposed by the industry's Ordering and Billing Forum (OBF) with Issue 2233. Qwest proposes to incorporate into the CICMP Qwest initiated CRs which impact Co-Providers, classify and prioritize CRs by severity type and collaborate with CLECs to develop system releases that include and meet regulatory, system and CLEC requirements.

¹ EXC2003 HP Reply Attachment

- In addition, Qwest's proposal will include guidelines and procedures for:
- Escalations/Expedites of changes
- New and/or Retired Interfaces
- Change notification for Products/Processes

Qwest believes that this comprehensive and collaborative approach to change management will address these issues and align Qwest with the direction the industry is taking with change management. Additional information/details will be available once the work in regulatory workshops and with the CLECs has concluded.

Qwest is in ongoing negotiations with the ROC TAG to arrive at agreement on two Change Management Performance Indicator Definitions (PIDs). The Change Management PIDs under consideration include "PO-16 Timely Release Notifications," and "GA -7 Software Outage Resolution". A meeting was held June 20th to review the latest drafts of these proposed PIDs. In that meeting tentative agreement was reached on PO-16. Formal TAG approval is expected in the June 28th TAG meeting. Qwest needs to provide a response to two outstanding issues on GA -7 and expects approval upon satisfactory resolution of these two issues. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards. Qwest does not support the third Change Management PID, "RQ-3 Release Quality," proposed by the co-provider community. This PID proposal is at impasse and under review by the ROC Steering Committee.

HP Supplemental Recommendation (July 13, 2001):

HP agrees with Qwest's proposal in their Supplemental Response dated 6/28/2001:

"Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions."

Due to the nature of the complexity of the solution to this Exception and the length of time it will take for Qwest to implement, HP recommends that this Exception remain open pending the successful implementation of the changed CICMP process.

Based on Qwest's Agenda provided for the July 11th, 2001 "CLEC/Qwest working session to modify the Change Management Process", there will be a timeline adapted for proposal review with the CLEC community.

And further based on the outcome of the timeline development, HP will provide an update to this Exception recommendation on a quarterly basis.

AT&T Comments:

Qwest proposes changes to its CICMP as the means to resolve the issues raised by this Exception. HP notes that implementing those changes will take a good deal of

time, and proposes that the Exception be kept open until its evaluation of the revised Qwest Change Management Process ("CMP") is completed.

These issues beg the question of defining the later evaluation as the continuation of testing of the Qwest Change Management Process or as a restart of testing. It is not clear whether Test 23 is "paused" or is being continued.

The Master Test Plan describes Test 23, the Change Management Process test. It's objective "... to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management." On the basis of this Exception, it appears that Qwest's current CICMP cannot serve as the basis for successful testing of Qwest's Change Management Process. However, a documented Change Management Process is one of the inputs to Test 23 – see 23.6.1 Test Inputs Items 1, 2, and 3.

AT&T questions:

- Is it KPMG/HP's intent to use the revised CMP for Test 23?
 - If yes, which release will be used for that test? See 23.6.1 Test Inputs item 4. "One significant software release that has been recently implemented"
 - If no, which CMP is planned for Test 23?
- Is it KPMG/HP's intent to continue testing the Change Management Process to evaluate other aspects of Qwest's release notification and CLEC support capabilities? See MTP Table 23.4.1 and 23.6.2 Test Activities.
- Is it KPMG's intent to "pause" Test 23 until the revised Change Management Process is available?

The following table identifies the multiple revisions that have been released for the IMA Release 6.0 Disclosure Documents. Each row of the table notes the chapters of the Disclosure Documents that were revised and the date of each revision. Fifty-three chapters and three appendices were included in the initial release on December 8, 2000. Three revisions have been released, updating and revising certain chapters. In addition, five addenda were added and released between January 15, 2001 and March 27, 2001.

Chapter	Title	Draft 11/20/00	Release 12/08/00	Revised 01/29/01	Revised 02/15/01	Revised 03/23/01
00	Table of Contents	X	X			
01	Main Introduction	X	X			
02	EDI Introduction	X	X			
03	Customer Service Record Transaction Cycle	X	X	X	X	
04	Address Validation Transaction Cycle	X	X	X		
05	Check Facility Availability Query	X	X			
06	Service Availability Transaction Cycle	X	X			
07	CFA Validation Transaction Cycle	X	X			
08	Appointment Reservation Transaction Cycle	X	X			
09	Telephone Number (TN) Assignment Transaction Cycle	X	X			
10	TN-Appointment Cancellation Transaction Cycle	X	X			
11	DLR Return	X	X	X		X
12	Meet Point Validation	X	X	X	X	
13	Raw Loop Data	X	X	X	X	
14	POTS Resale Order Submittal	X	X	X		
15	PBX Order Submittal	X	X	X	X	
16	Local Number Portability Transaction Cycle	X	X			
17	Interim Number Portability (INP) Order Submittal	X	X			
18	Unbundled Loop order Submittal	X	X			
19	Unbundled Loop with NP Order Submittal	X	X			
20	Unbundled Analog (ANA) Line-Side Switch Port	X	X			
21	Unbundled Digital Line-Side Switch Port	X	X	X		
22	Resale Private Line Order Submittal	X	X			
23	Centrex Resale Services	X	X	X	X	
24	BRI ISDN Resale Order Submittal	X	X			
25	Directory Listing (Simple) Feature	X	X			
26	Directory Listings Only Feature	X	X			
27	Resale Frame Relay	X	X			
28	Megabit Resale	X	X			

Character	Title	Draft 11/20/00	Release 12/02/00	Revised 01/09/01	Revised 02/19/01	Revised 03/23/01
29	Public Access Line Ordering	X	X			
30	Public Access Line Ordering - PSP	X	X			
31	Centrex 21 Resale Services	X	X			X
32	DID In Only Trunk	X	X	X	X	
33	Design Trunk Resale	X	X			
34	Unbundled Analog DID-PBX Trunk	X	X			
35	DS1 DID-PBX Trunk Port Facility	X	X	X		
36	DS1 DID-PBX Trunks	X	X			
37	Unbundled Feeder Loop	X	X	X		
38	Unbundled Distribution Loop	X	X	X	X	
39	Unbundled Distribution Loop with Number Portability	X	X	X	X	
40	Shared Loop	X	X	X	X	
41	UNE -P POTS	X	X	X		
42	UNE -C PL	X	X			
43	PRI ISDN Facility	X	X	X		
44	PRI ISDN Trunks	X	X	X		
45	UNE -P BRI ISDN	X	X			X
46	Fatal Error Response Transaction	X	X			
47	Non-Fatal Error Response Transaction	X	X			
48	Jeopardy Transaction	X	X			
49	Firm Order Confirmation (FOC)	X	X	X		
50	Completion Response Transaction	X	X			
51	Service Request Status Inquiry Transaction	X	X			
52	Status Change Inquiry - Auto Push	X	X			
53	Functional Acknowledgement Response Transaction Cycle	X	X			
A	Developer Worksheets - Pre-Order	X	X	X		X
B	Developer Worksheets - Order	X	X	X	X	X
C	Developer Worksheets - Post-Order	X	X	X		
6.0 EDI Disclosure Addendum Version 1					01/15/01	
6.0 EDI Disclosure Addendum Version 1 Correction Update					01/29/01	
6.0 EDI Disclosure Addendum Version 2					02/26/01	
6.0 EDI Disclosure Addendum Version 3					03/23/01	
6.0 addendum 3 Correction Update					03/27/01	

Release 6.0 Target Release Date:
 Point Release 6.0.1 Target Release
 Date:

Qwest IMA Release 6.0 Implementation Release Notification Timeline Comparison
 December 11, 2000
 February 26, 2001

Release Notification	Method	Qwest Timing	Projected Delivery Date	CICMP Web Site Calendar Scheduled Delivery Date	Actual Delivery Date
Target Release Life Cycle	CICMP Web Page	As soon as possible, usually 9 months prior to target release date			
Co-Provider Change Request Options for a Release	Co-Provider Industry Team Member E-Mail Distribution	As soon as possible, usually 10 months prior to target release date	March 11, 2000		
Release Baseline Candidates with Descriptions	Co-Provider Industry Team Member E-Mail Distribution	During the development phase after design (i.e., one week after scope commitment) usually targeted 120 days prior to target release date	February 11, 2000		
Draft developer Worksheets		During the development phase after design (i.e., one week after scope commitment) usually targeted 120 days prior to target release date	August 11, 2000	July 20, 2000	July 21, 2000 August 23, 2000 (Clarification)
Disclosure Document	As Requested Web Page Posting and CD Mailing	21 days prior to target release date	November 6, 2000	July 20, 2000	
Recertification Notice	Technical Project Meetings and Meeting Minutes	As required following target release date	November 20, 2000	November 6, 2000	October 3, 2000
Disclosure Document Addendum	Web Page Posting and CD Mailing	21 days prior to target release date		Not Listed	November 7, 2000
Release Notes Description	Co-Provider Industry Team Distribution Package -- CICMP Web Page	Six weeks prior to target release date		Not Listed	December 11, 2000 January 16, 2001 February 23, 2001
Release Notes	IMA/CICMP Web Page	21 days prior to target release date	October 11, 2000		
Point Release Notes Description	Co-Provider Industry Team Distribution Package -- CICMP Web Page	21 days prior to target release date	November 20, 2000	Not Listed	October 27, 2000
Point Release Notes	IMA/CICMP Web Page	10 days prior to target release date	February 5, 2001	November 20, 2000	November 22, 2000
			February 16, 2001	Not Listed	January 18, 2001
				Not Listed	January 30, 2001

Test Vendor ID: OBS 3052
Qwest Internal Tracking ID: TI 676
Observation/Exception Title: Change Management Process
Test Type/Domain: Test 23- Change Management
Date Qwest Received: 11/08/2001
Initial Response Date: 11/15/2001
1st Supplemental Response Date: 11/28/2001
2nd Supplemental Response Date: 12/05/2001
3rd Supplemental Response Date: 12/28/2001
4th Supplemental Response Date: 01/07/2002
5th Supplemental Response Date: 01/11/2002
6th Supplemental Response Date: 01/21/2002
7th Supplemental Response Date: 02/05/2002

Test Incident Summary:

An observation has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

Observation:

Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces.

Background:

Production support changes address defects in the production version(s) of an OSS interface. Such defects may include interrupted connectivity, failed transactions, system crashes, degraded performance, data corruption, memory leaks, and/or functionality not coded to specification.

The purpose of a production support process is to quickly and effectively restore critical production components by repairing defects or implementing temporary work-around processes. This process would also include the implementation of a tactical plan to complete restoration of normal production capabilities. For critical situations, standard software release intervals would be too long to implement through the established change management process.

Issue:

KPMG Consulting observed that Qwest CMP does not have a documented process to address production support changes. However, Qwest states in a recent public filing¹ that:

“While the parties² have not fully discussed or reached agreement on the categories of changes to be included in Qwest’s CMP, Exhibit A includes all five categories of system changes included in SBC’s [SBC Communications, Inc.] documents. Those categories are listed in Exhibit A under the heading Changes to Existing Interfaces. *Qwest has already implemented the five categories of changes in its OSS CMP process.*” [Italics added]

According to Exhibit A³, the five categories of changes are defined as follows:

Type 1	Production Support change
Type 2	Regulatory change
Type 3	Industry Guideline change
Type 4	Qwest Originated change
Type 5	CLEC Originated change

KPMG Consulting infers from the above statements that Qwest has a documented process in place to support Type 1 Production Support changes in the CMP Process.

KPMG Consulting examined the Qwest Change Management Process and established guidelines, but could not locate documentation to support the above statement in italics. The *Co-provider Industry Change Management Process (CICMP) Document*⁴ and the *IMA Change Management Document*⁵ define various change request processes, but lack specific information about production support changes that need to be processed on an expedited basis.

Question:

1. Does Qwest have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces? If so, KPMG Consulting requests that Qwest provide the document(s) for review.

Qwest Formal Response

Qwest confirmed that Qwest OSS contingency plans exist and are utilized by production support teams. The Qwest OSS Contingency Plan process is as follows:

1. The first point of contact for a CLEC to report a production problem is the Wholesale Systems Help Desk (WSHD). If the WSHD determines that a system needs to be involved to resolve the problem, they will contact the AIP/Client Services team.
2. The AIP/Client Services team accepts and researches production concerns received from the WSHD. They create Problem Management Record (PMR) tickets in the Problem Change Record Management (PCRM) system to track the issues. These tickets are then assigned to the production support team for the affected system. The AIP/Client Services team process is outlined on their website at:

¹ Qwest Corporation’s Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado, dated 10/10/2001, page 7.

² The term “parties” refers to Qwest and those CLECs involved in the CMP Redesign Process.

³ Master Redlined CLEC-Qwest CMP Redesign Framework, draft revised 10/3/2001.

⁴ The CICMP Document dated 5/11/2001 was the last CMP document before the start of CMP Redesign. It is located at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

⁵ The IMA Change Management Document defines the process through which Qwest prioritizes and processes Change Requests for IMA software releases.

http://ima-aip/trouble/newones/Ticket_Escalation.htm. This document will be provided as a confidential data request attachment.

3. If the problem requires an immediate system change, this information is handed off to the development team for the affected system. The production patch request process is then initiated.

Qwest is in the process of collecting all contingency plans and/or processes that exist to correct potential failures in the production versions of each OSS interface. These plans and/or processes will be provided to KPMG by November 27, 2001 as a supplemental response to Observation 3052.

Qwest Supplemental Response (11/28/01):

Qwest is providing contingency plans and/or processes that exist to correct potential failures in the production versions of OSS interfaces via the usual data request process (DR no. TI-676S1) for the following systems:

- CPPD (CPS)
- CRIS
- EXACT
- IABS
- IMA
- MEDIACC/CEMR

Qwest is still in the process of collecting contingency plans and/or processes for the following systems:

- HEET
- TELIS

The plans and/or processes for HEET and TELIS will be provided to KPMG by December 4, 2001 via the usual data request process (DR no. TI-676S2).

Qwest 2nd Supplemental Response (12/05/01):

Qwest has completed the collection of contingency plans for the HEET and TELIS systems. Qwest provided the HEET documentation via DR no. TI-676S2 on 12/4/01.

TELIS is a Cap Gemini Ernst & Young (CGE&Y) system. Qwest follows the procedures outlined in the CGE&Y document titled "Notification of Software Defects and Severity Levels." This document defines procedures for notifying CGE&Y of defects, defect management by CGE&Y and escalation procedures. The document is CGE&Y proprietary and can not be distributed.

KPMG Comments (12/20/2001):

Documentation Review

KPMG Consulting confirms that it received the following documents from Qwest:

1. AIP/Client Services: *Application in Production Ticket Escalation and Referral Process* dated November 16, 2001⁶;
2. CPPD: *Co-Provider Product Data System Support Plan* dated February 7, 2000⁷;

⁶ KPMG Consulting Data Request TI-676 Confidential Information.

3. CRIS (BCOE): *Billing Center of Excellence Problem Management Process* dated February 14, 2001⁸;
4. IABS: *IABS Problem Management Process Definition* dated September 6, 2001⁹;
5. IMA: *Production Patch Process* (not dated)¹⁰;
6. MEDIACC/CEMR: *Production Support/Wholesale System Help Desk Problem/Outage Management Process* (not dated)¹¹;
7. HEET: *Application Support & Change Management Plan* dated November 27, 2001¹².

KPMG Consulting did not receive the data items relevant to EXACT and TELIS, that are referenced in Qwest's supplemental response. Qwest indicated that the TELIS system documentation is proprietary and cannot be distributed to KPMG Consulting for purposes of this review. KPMG Consulting requests that Qwest provide the EXACT document as a supplement to Data Request reference number TI-676S2.

KPMG Consulting identified acronyms and/or systems that were not fully defined in the Qwest contingency plans:

- Document #2 referred to Polytron Version Control System (PVCS);
- Documents #1, 3 & 6 referred to Problem Change Request Management (PCRM);
- Document #1 referred to TPSP (no definition provided).

KPMG Consulting will formally submit a Data Request for documentation that provides more detailed information regarding these systems.

KPMG Consulting reviewed Qwest's responses, along with the documents it received, and noted the following issues:

- A. Four out of the seven documents do not contain essential document management elements such as issue date, version number, author/business unit, change log, and assumptions;
- B. Several documents do not provide definitions for participants and stakeholders (i.e., user, client, requestor, originator, etc);
- C. The process documents do not specify the definition and scope of production support issues;
- D. The documents lack clarity regarding if, and how, CLECs interact with Qwest business units for OSS problems;
- E. Several documents do not specify that Qwest should notify CLECs about the severity of a trouble ticket, or that CLECs can influence the severity assigned;
- F. The documents lack intervals for notification, escalation, and resolution;
- G. The documents do not specifically address the following:
 - planned and unplanned system outages;
 - slow response;
 - system availability; and
 - production support CRs.

Please refer to confidential Appendix A for KPMG Consulting's detailed analysis of the above seven documents.

Process Review

⁷ KPMG Consulting Data Request TI-676S1 Confidential Attachment A.

⁸ KPMG Consulting Data Request TI-676S1 Confidential Attachment B

⁹ KPMG Consulting Data Request TI-676S1 Confidential Attachment C.

¹⁰ KPMG Consulting Data Request TI-676S1 Confidential Attachment D.

¹¹ KPMG Consulting Data Request TI-676S1 Confidential Attachment E.

¹² KPMG Consulting Data Request TI-676S2 Confidential Attachment A

KPMG Consulting reviewed Qwest documents that specified OSS contingency plans, and found that these documents lack specific references to, and consideration of, Qwest interactions with CLECs. These contingency plans illustrate fragments of a production support framework, but do not constitute a comprehensive process that defines how this change category is integrated into the overall CMP.

In the absence of a comprehensive process document, KPMG Consulting was unable to validate specific steps and timelines related to each of the following production support processes:

- A. Identification and verification procedures;
- B. Evaluation, categorization, and prioritization procedures;
- C. Internal and external communication procedures;
- D. Status tracking and reporting procedures;
- E. Escalation procedures;
- F. Restoration and closure procedures;
- G. Testing procedures, including test environments; and
- H. Documentation management procedures.

KPMG Consulting requests that Qwest describe how production support issues and production support changes are handled on an expedited basis. Production support has been defined as the process by which CLECs interact with Qwest to resolve time sensitive production issues and changes. It is critical that Qwest (internal and external) processes be clearly documented, well formed, and described, within the context of the overall CMP. In the absence of a comprehensive framework for productions support issues and changes, there is no assurance that Qwest OSS functionalities consistently meet the needs of CLEC business operations.

Question:

1. What, if any, Qwest documentation, either provided to CLECs or used as internal guides, exists that describes production support changes as a uniform process?

KPMG Consulting recommends that Observation 3052 remain open pending resolution of the above issues.

Qwest Response to KPMG Comments (12/28/01):

Qwest has defined Polytron Version Control System (PVCS), Problem Change Request Management (PCRM) and TPSP in its responses to data requests CM28, CM29 and CM30 respectively.

The CMP Redesign Core Team has tentatively agreed upon language for Production Support, which addresses defects of systems and documentation. Refer to *Attachment A: Production Support*. Qwest has addressed creation and implementation of an integrated change management process that addresses both system enhancements and the correction of system bugs and documentation inaccuracies. Systems enhancements are addressed in the *Changes to An Existing OSS Interface* section of the *Master Redlined CLEC-Qwest CMP Re-design Framework – Revised 12-10-01* (<http://www.qwest.com/wholesale/cmp/redesign.html>). (See Attachment B: *Change to An Existing OSS Interface*.)

The CMP documents referred to above as Attachments A and B, and provided to CLECs, define a uniform process for production support and changes to OSS interfaces.

As stated in Qwest's Formal Response on November 15, 2001, when the Wholesale Systems Help Desk determines that a CLEC reported trouble may require a back-end system fix, the trouble report is handed off to the appropriate back-end system. Each Qwest back-end system will follow its own process for

problem resolution and prioritization of fixes and communicate status back to the Help Desk. The Wholesale Systems Help Desk will then communicate trouble ticket status back to the CLEC. The Wholesale Systems Help Desk is the single point of contact with the CLEC regarding the status of trouble tickets.

The Qwest Wholesale Systems Help Desk will update its methods and procedures and conduct training by January 3, 2002 to ensure that Help Desk personnel follow the procedures outlined in the CMP Production Support document (*Appendix A*).

Qwest will update the following back-end system documents previously provided in Data Requests TI-676, TI-676S1 and TI-676S2 to include a description of the process of handing off Help Desk trouble tickets (including those generated by CLECs) from the Wholesale Systems Help Desk and the requirement to communicate status back to the Help Desk. Qwest will also update these documents to include current "document management elements" and participant and stakeholder information. These documents will be updated by January 10, 2002:

-
- 1 AIP/Client Services: *Application in Production Ticket Escalation and Referral Process* dated November 16, 2001
 - 2 CPPD: *Co-Provider Product Data System Support Plan* dated February 7, 2000
 - 3 CRIS (BCOE): *Billing Center of Excellence Problem Management Process* dated November 27, 2001
 - 4 IABS: *IABS Problem Management Process Definition* dated September 6, 2001
 - 5 IMA: *Production Patch Process* (not dated)
 - 6 MEDIACC/CEMR: *Production Support/Wholesale System Help Desk Problem/Outage Management Process* (not dated)

HEET is an obsolete system and Qwest is in the process of retiring it. Accordingly, the document "HEET: *Application Support & Change Management Plan* dated November 27, 2001" will not be updated.

Qwest Supplemental Response (01/07/2002):

The documentation updates referenced in the 12/28/01 response remain on track for a 1/10/02 completion; however, Qwest has determined that the Help Desk Personnel training will not be completed until 1/25/02.

Qwest Supplemental Response (01/11/2002):

On 1/10/02 Qwest completed the documentation updates referenced in the 12/28/01 response. The documents will be provided via the data request process (DR # TI-676-S4 - OBS 3052) on 1/11/02.

Qwest Supplemental Response (01/21/2002):

On 1/17/02 Qwest completed the Help Desk personnel training effort, originally referenced in the 12/28/01 response.

KPMG Supplemental Recommendation (01/22/02):

KPMG Consulting reviewed Qwest's responses, along with information provided in response to the confidential portion of this Observation report. KPMG Consulting's response is comprised of a high-level, summary review and a detailed documentation review (Attachment A), which will be submitted to Qwest separately through the data request process.

KPMG Consulting reviewed the Qwest responses and determined that one of the fundamental issues originally identified in this Observation, i.e., that the implementation of Type 1 Production Support changes has not been fully implemented and remains unresolved. KPMG Consulting will address this issue separately from the context of this Observation.

Production Support Summary Review

KPMG Consulting identified key elements (referred to as Criteria A – I, below) of a production support process that it would expect to be included within the documented contingency plans for each interface:

- A. Identification and verification procedures;
- B. Evaluation, categorization, and prioritization procedures;
- C. Internal and external communication procedures;
- D. Status tracking and reporting procedures;
- E. Escalation procedures;
- F. Restoration and closure procedures;
- G. Testing procedures, including use of test environments;
- H. Documentation management procedures; and
- I. Training procedures.

KPMG Consulting reviewed the production support process documents that it received from Qwest, and noted the following issues:

- (1) Some process documents do not specify the definition and scope of production support issues (criterion A);
- (2) Several documents lack definitions for participants and stakeholders (i.e., user, client, requestor, originator, etc.) in the production support process (criteria A and I);
- (3) Documents lack production support intervals for notification (criteria A and C), escalation (criterion E), and resolution (criterion F);
- (4) Several documents lack essential document management elements such as issue date, version number, author/business unit, change log, and assumptions (criterion H);
- (5) Several documents lack clarity regarding if, and how, CLECs interact with Qwest business units for OSS production support problems (criterion D);
- (6) Several documents do not specify that Qwest notifies CLECs about the severity of a trouble ticket, or that CLECs can influence the severity assigned (criterion B);
- (7) The documents do not specifically address the following production support issues:
 - planned and unplanned system outages;
 - slow response times;
 - system availability; and
 - production support related CRs from the Wholesale Change Management Process.

KPMG Consulting requests that Qwest provide, in its response, a review of each of the interface documents referenced below, relative to criteria A through I, in the contexts of both the Wholesale System Help Desk (WSHD) and the Wholesale CMP. For verification purposes, KPMG Consulting requests that Qwest provide specific references to document title, and the reference item (i.e., section, page, figure) within each document for each criterion.

KPMG Consulting received the following documents on January 14, 2002 for review. The detailed analysis (Attachment A) will be provided to Qwest as a confidential document via the data request process.

IT WSHD: Ticket Escalation and Referral Process;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 1.

CPPD/CPS: System Support Plan;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 2.

CRIS (BCOE): Billing Center of Excellence Problem Management Process;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 3.

IABS: IABS Problem Management Process Definition;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 4.

IMA (ICOE): Production Patch Process;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 5.

MEDIACC/CEMR: Problem/Outage Management Process; and

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 6.

HEET

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 7.

Additional Supporting Documentation Review

In responses to Data Requests for this Observation, Qwest presented additional production support and contingency plan documentation for KPMG Consulting's review. These documents include:

PVCS Polytron Version Control System;

Qwest's response (CM28) and KPMG Consulting findings are documented in Attachment A, Section 8.

PCRM Problem Change Request Management;

Qwest's response (ID147) and KPMG Consulting findings are documented in Attachment A, Section 9.

TPSP Technology Policies, Standards, and Process Information Development and Deployment;

Qwest's responses (CM30 and OHD10) and KPMG Consulting findings are documented in Attachment A, Section 10.

EXACT;

Qwest's response (CM31) and KPMG Consulting findings are documented in Attachment A, Section 11.

TELIS;

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 12.

WSHD Wholesale System Help Desk Guide; and

Qwest's response (OHD10) and KPMG Consulting findings are documented in Attachment A, Section 13.

Employee Training Guide

Qwest's response and KPMG Consulting findings are documented in Attachment A, Section 14.

Proprietary Information

In its response, Qwest noted that some of the above applications are third party systems, and that specific vendor information for some of the major interfaces is proprietary. For clarification, KPMG Consulting does not necessarily seek third party vendor-specific and/or proprietary information. For purposes of this Observation, KPMG Consulting requests that Qwest provide information that addresses the following:

- Business functionality and objectives for each of the Qwest applications that are classified as proprietary (e.g., PVCS, PCRM, EXACT, and TELIS);
- The method(s) by which failures in OSS interfaces are communicated to CLECs via the Wholesale Systems Help Desk;
- Description(s) of Qwest production support processes for these applications to support CLECs; and

- Identification of Qwest stakeholders, and their roles and responsibilities, relative to these systems for production support.

KPMG Consulting would expect Qwest to provide documentation that it uses to integrate wholesale business and production support tools, including any used for training of its staff.

KPMG Consulting recommends that Observation 3052 remain open pending resolution of the above production support process documentation issues.

Qwest Response to KPMG Supplemental Recommendation (02/05/2002):

In the 01/24/02 response to Exception 3102, Qwest committed to provide an integration document to KPMG by February 7, 2002. This document will address Criteria A – I outlined by KPMG in the "Production Support Summary Review" section of this observation.

In the "Proprietary Information" section of KPMG's 01/22/02 response, KPMG requested that Qwest provide additional information on the PVCS, PCRM, EXACT and TELIS applications. Qwest will provide this information by February 11, 2002.

In the confidential attachment to Observation 3052, KPMG identified several issues related to documents that Qwest provided via the confidential data request process. Qwest will respond to those issues and provide updated documents by February 11, 2002.

Attachment(s): None

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Response Date: January 6, 2002

Second Response Date: January 24, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Observation:

Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access (IMA) interface.

Background:

IMA is a Qwest system that enables CLECs to access local telephone service elements of the Qwest network and Operations Support Systems. It automates the process by which Local Service Requests submitted by CLECs are used to create service orders.

Qwest has defined two types of IMA release implementations¹, with attributes as follows:

Major releases (e.g., IMA 8.0) –

- Add functionality to systems and processes;
- Scheduled three times per calendar year; and
- Changes are subject to the prioritization process.

Point releases (e.g., IMA 8.01) –

- Only concern back-end systems;
- Augment functionality disclosed in major releases; and
- Changes are not subject to the prioritization process.

In the context of the monthly CMP meeting and CMP Redesign Process, Qwest has stated that point releases do not require CLECs to make system or process changes². Unlike change requests that comprise major system releases, point release changes are not subject to the prioritization process.

¹ Refer to page three of the draft meeting minutes for Qwest's 10/30/2001-11/1/2001 CMP Redesign session. At that meeting, Jeff Thompson, Qwest's IT Director of ASR and Center Efficiency Processes, explained to CLEC participants the differences between a major release and a point release.

² See meeting minutes for Qwest's 10/16/2001 and 10/30/2001-11/1/2001 CMP Redesign working sessions, respectively, and meeting minutes for the 10/18/2001 Systems CMP Meeting at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

Issue:

Qwest does not consistently apply the defined CMP for CLEC-impacting system changes for point releases to the IMA interface. KPMG Consulting has observed at least two examples of point release changes that required, or would have required, a number of CLECs to make internal changes, such as employee training and process enhancements:

1. Qwest implemented changes to a backend database in IMA 6.01, and did not inform CLECs of the changes. This implementation resulted in CLECs' inability to process orders.³
2. A more recent instance involves Change Request (CR) 25152⁴ in IMA 8.01. Qwest presented this GUI-only change at the monthly Systems CMP meeting on October 18, 2001, and announced that the change would be implemented on November 19, 2001. Qwest removed this CR from IMA 8.01 in early November, after CLECs Allegiance, AT&T, and Eschelon raised concerns about this issue, stating that the CR was CLEC-impacting.⁵

Furthermore, it does not appear that clearly defined, documented Qwest processes or procedures exist to ensure that all CLEC-impacting IMA changes are identified and submitted for CLEC voting, as part of the prioritization process.

Impact:

The absence of a defined process for identifying CLEC-impacting changes, combined with inconsistent use of the documented CMP process, makes it difficult for CLECs to prepare for and respond to Qwest point releases. This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers.

Question:

What steps will Qwest take to ensure that CLEC-impacting systems changes are identified and communicated to CLECs through the CMP process?

³ This issue led to the HP filing of Exception 2007.

⁴ CR#25152 "Enhancements for Appointment Scheduler" will require a CLEC to schedule an LSR appointment based on Qwest's resource availability.

⁵ See the meeting minutes for the 10/18/2001 Systems CMP Meeting and Action Item #366 in the 11/15/2001 Systems CMP Distribution Package at http://www.qwest.com/wholesale/downloads/2001/011109/November_15_Package.pdf.

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Qwest OSS Evaluation

Qwest Formal Response (12/20/01):

Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point releases. These agreements are documented in the *Master Redlined CLEC-Qwest CMP Re-design Framework – Revised 12-10-01*, <http://www.qwest.com/wholesale/cmp/redesign.html>, include:

- CR origination processes for Qwest and CLEC OSS Interface CRs
- Introduction of a New OSS Interface
- Changes to an Existing OSS Interface
- Retirement of an OSS Interface.

Qwest and the CLECs have agreed to implement these processes coincidentally with the implementation of the IMA 10.0 release in June 2002. Qwest and the CLECs will continue to collaboratively monitor and refine these processes through CMP.

Qwest and the CLECs are currently negotiating the *Qwest Proposed Prioritization Language* to document a process that will ensure that CLECs will have an opportunity to rank CLEC and Qwest submitted CRs. The Redesign Team is also negotiating provisions within the *Qwest Proposed Prioritization Language* to allow CLECs to prioritize Regulatory and Industry Guideline CRs, provided that the prioritization of these does not cause them to miss their mandated implementation dates. This language is scheduled for discussion at the January 22, 2002 CMP Re-design Meeting. Additionally, the Re-Design team continues to work toward collaboratively, and formally, addressing the definition of major and point releases.

To ensure that these agreed to processes are implemented quickly and effectively, Qwest is developing internal CMP training that is mandatory for Qwest IT personnel who work with systems that impact the CLECs.

KPMG Consulting's First Response (01/06/02):

KPMG Consulting reviewed Qwest's response and identified the following issues:

1. KPMG Consulting is aware of the ongoing CMP Redesign effort, but is unable to locate information in the *Master Redlined CLEC-Qwest CMP Re-design Framework* that indicates and explains how Qwest-initiated point-release changes are subject to the prioritization process. It is unclear how much information Qwest communicates to CLECs about point-release changes, and how Qwest

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systematically identifies all CLEC-impacting changes and submits them for CLEC voting, as part of the prioritization process.

2. KPMG Consulting requests that Qwest provide related documentation for validation and verification of CMP training for Qwest IT personnel.

Qwest Response to KPMG Comments (01/14/02):

The following response addresses the two issues raised by KPMG in their response dated January 6th, 2002. KPMG's issues have been replicated in *Italics* for ease of reading.

1. *KPMG Consulting is aware of the ongoing CMP Redesign effort, but is unable to locate information in the Master Redlined CLEC-Qwest CMP Re-design Framework that indicates and explains how Qwest-initiated point-release changes are subject to the prioritization process. It is unclear how much information Qwest communicates to CLECs about point-release changes, and how Qwest systematically identifies all CLEC-impacting changes and submits them for CLEC voting, as part of the prioritization process.*

Upon further review, Qwest has determined that the *Master Redline* document does not address the point release issues identified by KPMG in this observation. This is because Qwest and the CLECs have not yet agreed to the prioritization language that will be included in the *Master Redline* document. The CLECs and Qwest should finalize the prioritization language during the next CMP Redesign Meeting scheduled for January 22-24, 2002.

Point Releases were discussed in the October 30th, 2001 CMP Redesign Meeting. During that session, Jeff Thompson (Qwest IT) defined a point release as follows: "*a point release is a Qwest release that has no impact to CLEC code on the interface (excluding previously disclosed changes) and could include a fix for bugs introduced in the major release.*" He further explained that "*a point release could be changing something in the GUI only, or implementing a code change Qwest had included in the release but that had not been activated in the major release.*" (CMP Re-Design Meeting October 30 - November 1 Final Minutes - 11-30-01, page 3, paragraph 2, http://www.qwest.com/wholesale/downloads/2001/011130/CMP_Redesign_Meeting_Oct_30-31_Nov_1_Final_Minutes.doc) Qwest and the CLEC community have agreed that "*Point Release[s] may not be CLEC code impacting, but may affect CLEC operating procedures. The purpose of a point release is to fix bugs introduced in previous releases, implement technical changes, make changes to the GUI, and deliver enhancements disclosed for a prior major release that could not be delivered in the timeframe of that release.*" (Qwest Proposed TERMS Language - 11-30-01, http://www.qwest.com/wholesale/downloads/2001/011206/Qwest_Proposed_TERMS_Language-11-30-01.doc)

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Qwest communicates all changes impacting the CLEC community via the defined CMP procedures. If a point release does not contain changes that impact the CLEC code it may not go through the CMP. However, all point releases will comply with the standard IT notification requirements. Although the CMP is now being redefined, CLEC notification currently includes 1) discussion of the change during the regularly scheduled CMP meetings and 2) publication of the changes in the release notes. Qwest will comply with all approved modifications to CMP notification requirements.

Qwest and the CLEC community have had and continue to have an ongoing dialogue regarding what constitutes a CLEC-impacting change. It is anticipated that a common understanding will be reached through the CMP Redesign.

2. *KPMG Consulting requests that Qwest provide related documentation for validation and verification of CMP training for Qwest IT personnel.*

To be submitted as a confidential data request attachment is a PowerPoint document which contains the Wholesale Change Management Process (CMP) Training Module 1. To date, 9232 Qwest employees and contractors have taken part in this training. Of those having taken part in the training, 1342 are members of the IT staff. Additional training is under development and will be provided as the CMP Re-design progresses.

Attachment(s): Confidential DR to be filed

KPMG Consulting's Second Response (01/24/02):

KPMG Consulting confirms that it received the referenced PowerPoint document, which contains Wholesale CMP Training Module 1 used to train Qwest IT personnel. KPMG Consulting reviewed the document, and found that it contains a high-level overview of CMP. Based on information from this document, and from Qwest's January 14, 2002 response, KPMG Consulting understands that Qwest is committed to continuing to update and develop CMP training for its employees in the future.

KPMG Consulting reviewed Qwest's response, and understands that point release changes are not necessarily subject to the CR prioritization process. Nevertheless, the following issues, which were identified in KPMG Consulting's First Response, dated January 6, 2002, remain unresolved:

- The amount of information that Qwest communicates to CLECs about point-release changes;
- The notification intervals for point-release changes; and
- The process by which Qwest systematically identifies all CLEC-impacting changes.

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KPMG Consulting introduced two examples in this Observation to illustrate that the changes in question had, or would have had, a material impact on the CLECs' ability to process orders. This appeared to conflict with the Qwest-provided definition of point releases, which states that they concern changes that only apply to back-end interface systems and should not affect CLEC's ability to process orders.⁶

KPMG Consulting attended the Change Management Process Re-design meetings on January 22 and 23, 2002. KPMG Consulting will continue to gather information related to point release changes from future Re-design sessions.

KPMG Consulting recommends that this Observation remain open pending resolution of the above issues.

Attachment(s): None

⁶ During a KPMG Consulting interview on September 25, 2001, Mark Routh, then CMP (Systems) Manager, stated that, "Point release changes add functionality disclosed in major releases but only concern back-end systems." This definition is consistent with subsequent Qwest descriptions of point releases during CMP Redesign meetings.



ROC Observation & Exception Formal Response

Test Vendor ID: EXP 3093
Qwest Internal Tracking ID: TI 763
Observation/Exception Title: Lacking Processes for Document Management
Test Type/Domain: Test 23 - Change Management
Date Qwest Received: 12/12/2001
Initial Response Date: 12/19/2001
Supplemental Response Date: 02/05/2002

Test Incident Summary:

An exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.

Background:

Qwest uses text documents, spreadsheets, presentations, and Web sites to disseminate information about existing and planned wholesale products and services, such as business processes, technical specifications, release schedules, notification intervals, training opportunities, and meeting events. Such CLEC-impacting information is time sensitive and critical to CLECs for establishing, maintaining, and improving business operations.

The *Qwest Change Management Process (CMP)*¹ states as one of its key elements "Consistent documentation and tracking of changes and change notifications."² In addition, the document states, "CMP will improve and facilitate communication between CLECs and Qwest by supporting [...] consistent documentation and tracking of Change Requests (CR) and Release Notification (RN)."³ Furthermore, the *CMP* defines the sub-process, "Manage Documentation," as follows: "Activities involve the creation and improvement of documents including logs, forms, and process descriptions."⁴

Issues

Qwest lacks uniform standards and processes for document management. KPMG Consulting found that the *Change Management Process (CMP)* does not include established processes to ensure that documents distributed to CLECs have uniform standards, and that a process for maintaining and updating documentation is in place. As part of the *CMP* Verification and Validation Review (Test 23), KPMG

¹ *Change Management Process (CMP)* document, dated May 11, 2001, is available at http://www.qwest.com/wholesale/downloads/2001/010514/CMP_Document_051401.doc

² Executive Summary section of the *CMP* document, page XX.

³ Section 3, Page 3 of the *CMP* document.

⁴ Section 3.2, Page 5 of the *CMP* document

Consulting reviewed Qwest documents for the existence of documentation management standards, and found that a number of the documents lack fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs (see Appendix A for details).

Impact:

The lack of documentation management standards and processes may create difficulties for CLECs, such as:

Deficiency in Qwest Documentation Management	Impact on CLECs
Absence of author and/or issued by information	CLECs are unable to identify the proper contact person(s) within Qwest to address issues related to documentation errors and/or updates.
Absence of relevant Qwest business unit(s) and/or department(s)	CLECs are unable to assess changes and design training.
Absence of release and/or effective date(s)	CLECs are unable to schedule training, prepare systems, understand when changes go into effect, and comply with Qwest practices.
Absence of page numbers	Readers lack references to content.
Absence of version control and/or release history	Time-consuming and labor-intensive process for CLECs to manage changes.
Absence of applicability information and/or assumptions	Difficult to understand relevance and pre-requisites. Lack of clarity and increased possibility of errors.
Absence of change log and/or "change tracker" information	Time-consuming and labor-intensive process for CLECs to identify and apply changes.

The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices, possibly resulting in negative impact on CLEC business operations and profitability. It is both time-consuming and potentially error-causing for CLECs to manually compare different versions of the same document, to identify changes to Qwest wholesale systems, products, and processes. Furthermore, CLECs may need additional resources to validate Qwest documentation, thereby increasing operating cost.

Appendix A

Data Points

KPMG Consulting analyzed a random sample of 16 publicly available Qwest documents for documentation management practices. The data points included in this test sample are as follows:

1. *Qwest Service Interval Guide for Resale and Interconnection Services*⁵
2. *Qwest Service Interval for Access Services*⁶
3. *Qwest Getting Started as a CLEC*⁷
4. *Qwest Billing Percentage Development Worksheet*⁸
5. *Qwest Competitive Local Service Schedule*⁹
6. *Qwest New Customer Questionnaire*¹⁰
7. *Qwest Customer Information and Media Provisioning (EDATA)*¹¹
8. *Qwest Fiber Data Reports User Guide*¹²
9. *Qwest Central Office Space, Power & DS3 Denial Report*¹³

⁵ Document http://www.qwest.com/wholesale/downloads/2001/011203/SIG_Interconnection120301.pdf moved from http://www.qwest.com/wholesale/downloads/2001/011102/SIG_Interconnection110201.doc

⁶ Document <http://www.qwest.com/wholesale/downloads/2000/001031/SIGAccess103100.pdf> moved from <http://www.qwest.com/wholesale/downloads/2000/001031/SIGAccess103100.doc>

⁷ Document <http://www.qwest.com/wholesale/downloads/2001/011203/CLECCheck120401.doc> moved from <http://www.qwest.com/wholesale/downloads/2001/011018/CLECCheck101901.doc>

⁸ Document http://www.qwest.com/wholesale/downloads/2000/billing_percentage.pdf moved from http://www.qwest.com/wholesale/downloads/2000/billing_percentage.doc

⁹ Document Qwest Utility Code U-5335-T Regulations, Terms, Conditions, Rates and Charges applying to Communications Services within the State of California http://tariffs.uswest.com:8000/docs/TARIFFS/California/QCC_AST/CA_QCC_AST_sec1p001p010.pdf#U-SW-TOC000005

¹⁰ Document http://www.qwest.com/wholesale/downloads/2001/011002/Customer_Questionnaire_v17.doc moved from http://www.qwest.com/wholesale/downloads/2001/011022/Customer_Questionnaire_v17_10-19-01.doc

¹¹ Document http://www.qwest.com/wholesale/downloads/2001/011108/EDATA_Userguide_6t.pdf moved from http://www.qwest.com/wholesale/downloads/2001/010709/EDATA_Userguide_6.doc

¹² Document <http://www.qwest.com/wholesale/downloads/2001/011204/ACCESSINGFIBERDATAREPORTS.pdf> moved from <http://www.qwest.com/wholesale/downloads/2001/010801/ACCESSINGFIBERDATAREPORTS.doc>

¹³ Spreadsheet <http://www.qwest.com/wholesale/downloads/2001/011129/SpaceDenialSpreadsheetV2-0112101.xls> moved from http://www.qwest.com/wholesale/downloads/2001/011101/Space_Denial_SpreadsheetV2-0_103101.xls

10. *Qwest Technical Document Primary Rate ISDN Service*¹⁴
11. *Qwest Customer Electronic Maintenance & Repair (CEMR) User's Guide*¹⁵
12. *Qwest IMA Data Document for the Stand Alone Test Environment (SATE)*¹⁶
13. *Qwest Co-Provider Change Request Form Instructions Co-Provider*¹⁷
14. *Qwest Summary Change Management Process (CMP) Product/ Process*¹⁸
15. *Qwest Held, Escalated & Expedited Tool (HEET) Job Aid*¹⁹
16. *Qwest 12-Month Targeted OSS Interface Release Schedule*²⁰

Criteria

For the purpose of this test, KPMG Consulting applied the following document management standards to assess whether Qwest's CMP documents provided a consistent and clearly defined level of information:

- Existence of author and/or issuer information;
- Existence of relevant Qwest business unit(s) and/or department(s);
- Existence of release date and/or effective date information;
- Existence of page numbers;
- Existence of version control and/or release history;
- Existence of applicability information and/or assumptions; and
- Existence of change log and/or "change tracker"²¹ information.

¹⁴ Document moved from <http://www.qwest.com/wholesale/downloads/2001/011013/77400IssueA.pdf>

¹⁵ Document http://www.qwest.com/wholesale/downloads/2001/010829/01-Cover_Page525.doc

¹⁶ Document <http://www.qwest.com/wholesale/downloads/2001/011128/DataDocumentV8.07.doc> moved from http://www.qwest.com/wholesale/downloads/2001/011102/Data_Document_V_8_05_103101.doc

¹⁷ Document http://www.qwest.com/wholesale/downloads/2001/011120/CR_Form_11-02-01_rev9_ro.doc moved from http://www.qwest.com/wholesale/downloads/2001/010313/Co-Pro_Change_Req_Form_Inst_031301.doc

¹⁸ Document http://www.qwest.com/wholesale/downloads/2001/011205/CLEC_CMP_ProductProcess_Interactive_Report.PDF moved from http://www.qwest.com/wholesale/downloads/2001/011029/CLEC_Change_Request-ProductProcess_Summary_Report.PDF

¹⁹ Document <http://www.qwest.com/wholesale/downloads/2001/010921/HEETJobAid.doc>

²⁰ Presentation <http://www.qwest.com/wholesale/downloads/2001/010724/12monthTgtOSSched.ppt>

²¹ Feature in MS Word that is used to visualize document revisions

Findings

KPMG Consulting found that a number of documents did not comply with the above documentation standards. Of the 16 documents sampled, only two satisfied all requirements: the *Qwest Competitive Local Service Schedule* (#5) and *Qwest Customer Electronic Maintenance & Repair (CEMR) User's Guide* (#11). The table below summarizes the results of this documentation analysis.

Qwest Document Name	Author/ Issued By	Business Unit/ Department	Release/ Effective Date	Page #	Version Control/ Release History	Applicability/ Assumptions	Change Log/ Track Changes
SIG for Resale and Interconnection Services	N	N	Y(1)	Y	N	N	N
SIG for Access Services	N	N	Y(1)	Y	N	N	N
Getting Started as a CLEC	N	N	Y(1)	Y	N	N	N
Billing Percentage Development Worksheet	N	N	Y	Y	N	N	N
Qwest Tariffs	Y	Y	Y	Y	Y	Y	Y
Qwest New Customer Questionnaire	N	N	Y(1)	Y	Y	N	N
Customer Information and Media Provisioning (EDATA)	Y	Y	Y	Y	Y	Y	N
Qwest Fiber Data Reports User Guide	Y	Y	Y	Y	Y	Y	N
Qwest Central Office Space, Power & DS3 Denial Report	N	N	Y(1)	N	N	N	N
Qwest Technical Document Primary Rate ISDN Service	Y	Y	Y	Y	Y(2)	Y	N
Customer Electronic Maintenance & Repair (CEMR) User's Guide	Y	Y	Y	N	Y	Y	Y
Qwest IMA Data Document for the Stand Alone Test Environment (SATE)	Y	Y	Y(1)	Y	Y	Y	N
Co-Provider Change Request Form Instructions	Y	Y	Y(1)	N	N	N	N
Summary Change Management Process (CMP) Product/ Process	N	N	Y	Y	N	N	N
Held, Escalated & Expedited Tool (HEET) Job Aid	N	N	Y	N	N	N	N
Qwest 12-Month Targeted OSS Interface Release Schedule	N	N	Y	Y	N	N	N

Legend:

Y – Yes, attribute identified

N – No, attribute not present

- (1) Document date in filename only²²
- (2) Document is simultaneously marked "Final Draft" and "Issue A"²³

Qwest Formal Response:

Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.

KPMG Comments (01/07/02):

KPMG Consulting reviewed Qwest's response, and is aware of Qwest's effort to develop a documentation control process for all documents utilized by CLECs, including, but not limited to, PCAT and Tech Pub documentation. KPMG Consulting will conduct retesting after Qwest has implemented the referenced documentation control process, and requests that Qwest provide related process documentation after it becomes available. KPMG Consulting will then evaluate the process and documentation, relative to the document management issues raised in this Exception.

KPMG Consulting recommends that this Exception remain open pending retesting, following Qwest's implementation of the documentation control process, and delivery of related process documentation.

Qwest Response to KPMG Comments (02/05/02):

Qwest has determined that the magnitude of this new documentation control process effort is greater than initially anticipated and involves the coordination of IT and Network groups in addition to Wholesale. Qwest is in the process of coordinating and completing this effort by February 22, 2002. By that date Qwest will provide to KPMG internal guidelines developed to address the seven concerns listed in the Criteria Section of this exception, and confirmation that all appropriate employees have been trained to follow these new guidelines.

Attachment(s): None

²² Refer to footnotes number 5 through 20 in this document

²³ Final Draft and Issue A are a combination of terms that may be misleading if readers presume that the document is to be updated.

EXCEPTION 3094 – SECOND RESPONSE

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Initial Release Date: December 12, 2001

First Response Date: January 7, 2002

Second Response Date: February 12, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Background:

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. On October 17, 2001 Qwest informed CLECs of a Qwest-initiated Process CR PC100101-5 “Clarification of additional testing process” (see Attachment A), which was scheduled for implementation on November 19, 2001¹. At a follow-up meeting on October 31, 2001, CLECs reported to Qwest that the CR would affect their business operations, and that Qwest did not provide adequate information about this CR to answer the following questions:

- Regulatory: CLECs requested that Qwest investigate whether or not the proposed CR would comply with Qwest’s legal obligations, such as SGATs and Interconnection Agreements;
- Products: CLECs requested that Qwest provide a list of all products affected by this CR. At the follow-up meeting, Qwest was unsure if the CR would affect line-shared loops; and
- Documentation: CLECs requested that Qwest include the precise wording of the affected Product Catalogue (PCAT) in the CR. In the CR, Qwest provided limited text to describe the new process, and how the changes would affect CLECs.

¹ Information about this CR and supporting documentation (process documentation, process presentation, and Question & Answers) may be found at <http://www.qwest.com/wholesale/cmp/changerequest.html>.

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In order to respond to the remaining CLEC inquiries, Qwest scheduled a follow-up meeting on November 26, 2001, and delayed the scheduled implementation until December 1, 2001.

During CMP Redesign meetings, at least three CLECs made an attempt to halt the implementation date and escalate this CR. Qwest implemented CR PC100101-5 on December 1, 2001, and distributed a notification on December 3, 2001².

The event timeline for the CR that is the subject of this Exception is as follows:

Date	Event
10/17/2001	Qwest presented change request (CR) PC100101-5 "Clarification of additional testing process" at the monthly Change Management meeting.
10/31/2001	Follow-up meeting held – Intended for Qwest to clarify outstanding issues.
11/26/2001	Follow-up meeting held – Qwest answered some of the questions from CLECs.
12/01/2001	Scheduled process implementation date
12/04/2001	Qwest notification about update applied to CEMR User Guide. CLECs issue written statement requesting a status update, and that Qwest immediately stop implementation of this CR.

Issue:

KPMG Consulting observed the following issues related to CR PC100101-5:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change³;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.

² Qwest notification titled "Documentation: CEMR: User's Guide Updated: 12/03/01."

³ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

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- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

Impact:

Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.

Qwest Formal Response (12/21/01):

This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions. CLECs have now clearly stated, however, that they never intended for that interim process to apply to the Qwest-initiated change at issue here.

At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs *only* for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop. Therefore, under the established change management process, Qwest was not required to submit or process a CR for this issue in the first place. Nonetheless, even though submission of the CR turned out not to be necessary, Qwest submitted a CR in good faith and followed the interim process.

Qwest's responses to each of the five bullet points KPMG raises are set forth below.

KPMG Issue: *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;*

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Qwest Response:

Qwest provided information and answered CLEC questions regarding this CR by introducing CR No. PC100101-5 to the CLEC community through the Change Management Process (CMP). As noted above, at the time Qwest submitted this CR, it did so based on a good faith effort to comply with the *Interim Qwest Initiated Product/Process Change Request Initiation Process*. Since that time, the CLECs have clarified that they want that process to only apply to certain changes arising from 271 workshops or OSS testing. All other Qwest initiated product/process changes will be discussed at future Redesign sessions. At those future sessions, the nature and amount of information that Qwest must provide regarding its product/process CRs will be defined. Thus, Qwest provided more information than was required under existing processes by submitting the CR to the CLECs.

Qwest's efforts to provide information did not stop with submitting the CR. Qwest held at least three meetings with CLECs to provide information and answer CLEC questions relating to the CR. See Chronology of Events below.

KPMG Issue: *Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change⁴;*

Qwest response:

The process for additional testing described in the CR, which was introduced on October 17, 2001, did not change from that time until the time it was fully implemented on December 1, 2001. Thus, the CLECs had more than 6 weeks -- not only 4 days -- to prepare for the change. The chronology below outlines the key notification dates relating to this CR.

Chronology of Events for CR No. PC 100101-5

- 10/17/01 - CMP Meeting: Qwest introduced "Description of Change" and agreed to provide detailed package for CLEC review. Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
- 10/26/01 - Notification forwarded to the CLEC community regarding presentation of CR in the October 31, 2001 CMP Re-Design Meeting.

⁴ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

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- 10/31/01 - CR presented to the participating CLECs at the CMP Re-Design Meeting. CLECs were requested to provide comments. **Qwest agreed to delay initial implementation date to address CLEC concerns.**
- 11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC community.
- 11/08/01 - PCAT Documents posted to the Qwest Wholesale CMP Document Review website: <http://www.qwest.com/wholesale/cmp/review.html>. Comments from CLEC community due in 15 calendar days (11/23/01), as stated in "Interim External Change Management Process for Qwest Initiated Product/Process Changes," Version 6 – 11/26/01.
- 11/13/01 - Notification transmitted to CLEC community regarding follow-up meeting scheduled for 11/26/01.
- 11/14/01 - CMP Meeting - Qwest advised CLEC community that PCAT documents currently are available for comment.
- 11/24/01 - No comments were received from the CLEC community regarding PCAT documents posted to the Qwest Wholesale CMP Document Review Website.
- 11/26/01 - Qwest conducted a follow-up meeting with the CLEC community to discuss any technical issues with the CR (primarily operational and testing issues). Responses to questions were prepared for posting on the Qwest Wholesale WEB page.
- 11/28/01 - "Questions & Answers for Additional Testing 11/26/01" document posted to Qwest Wholesale website
<http://www.qwest.com/wholesale/cmp/changerequest.html>
- 11/28/01 - "Additional Testing Process Document - 11/09/01" and "Additional Testing Process Presentation - 11/09/01" posted to Qwest Wholesale website: <http://www.qwest.com/wholesale/cmp/changerequest.html> These documents were previously posted in the Qwest Wholesale CMP Re-Design website: <http://www.qwest.com/wholesale/cmp/redesign.html>
- 11/30/01 - Qwest IT Wholesale Communicator, November 30, 2001, Document No. SYST.11.30.01.F.02444_CEMR_UG_Update, CEMR User's Guide Update transmitted to Qwest Wholesale Customers

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- 12/05/01 - Formal Escalation received from Eschelon regarding implementation of CR.
- 12/06/01 - Qwest response sent acknowledging receipt of Formal Escalation from Eschelon (PC100101-5-E01).
- 12/07/01 - KMC Telecom notified Qwest to participate in the formal escalation initiated by Eschelon.

KPMG Issue: *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

Qwest response:

Qwest acted on CLEC input by holding additional meetings and agreeing to delay the original implementation date. Further, the processes that Qwest and the CLECs agreed to use for resolving disagreements are the escalation and dispute resolution processes. CLECs have invoked the escalation process with regard to this CR. In accordance with that process, Qwest responded to the escalation and offered a proposed process for resolving the CLEC concerns. Qwest will continue to abide by the agreed processes for resolving the disagreements relating to this CR and hopes to reach a mutually agreeable solution to the issues.

KPMG Issue: *Qwest, through the CMP, did not update CR status on a timely basis;*

Qwest response:

The CMP database is posted to the website on an "every third day" basis with updated CR status, status history, responses, meeting minutes, etc. for all active CRs. Qwest therefore does not understand KPMG's statement and needs additional detail regarding the specific issue if KPMG needs a more specific response.

KPMG Issue: *Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.*

Qwest response:

The Qwest-initiated CR at issue here does not include rate changes. The purpose of the CR is to clarify that, if a CLEC chooses not to perform diagnostic testing to determine whether trouble resides within the CLEC's network, the CLEC may request that Qwest perform that testing on the CLEC's behalf. Under the process, a CLEC that asks Qwest to test on the CLEC's behalf also authorizes Qwest to charge the CLEC for performing that testing. Qwest proposed to use existing labor rates -- in CLEC interconnection

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agreements or the SGAT -- for performing the testing. Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way.

KPMG Consulting's First Response (01/07/02):

KPMG Consulting reviewed Qwest's response and found that the information presented differs in several ways from KPMG Consulting's understanding of the Interim Product/Process CMP. Qwest stated, in October 2001, that it would submit CRs for changes to products or processes that alter CLEC operating procedures, and that the Interim Product/Process CMP would govern all Qwest-initiated Product/Process CRs.⁵ KPMG Consulting attended the October 17, 2001 Product/Process CMP Meeting, and observed that Qwest planned to implement PC100101-5 sooner than the 45-day interval that the interim process specifies. CLECs expressly stated that this change would be CLEC-impacting.⁶

KPMG Consulting observed that, on October 31, 2001, Qwest agreed to take the following action items:

- | | |
|-----------------------|---|
| Regulatory: | Qwest would investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements; |
| Products: | Qwest would specify the products affected by the proposed CR; |
| Documentation: | Qwest would provide CLECs with the revised PCAT language. |

At the October 31, 2001 meeting, Qwest agreed to change the implementation date from November 19, 2001 to December 1, 2001. This change was made because Qwest planned to address important questions related to the above three topic areas at the follow-up meeting scheduled for November 26, 2001.

In response to CLEC objections, Qwest's legal and change management staffs stated, on November 29, 2001, that Qwest would investigate whether or not the implementation of this change would be suspended. As of December 1, 2001, however, Qwest had not provided CLECs with any status update regarding this CR. Based on information on the Qwest CMP Web site, it was unclear if CR PC100101-5 was going to be suspended, delayed a second time, or implemented on December 1, 2001. In response to a CLEC inquiry regarding the issue, Qwest formally informed CLECs, on December 4, 2001, that CR PC100101-5 had been executed on December 1, 2001, and advised the inquiring

⁵ *Qwest Corporation's Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado* dated October 10, 2001.

⁶ The draft meeting minutes of the October 17, 2001 Product/Process CMP meeting were included in the November 2001 Product/Process CMP distribution package located at <http://www.qwest.com/wholesale/downloads/2001/011112/ProductProcessNovDistPackage2.pdf>.

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CLEC, through an email response, that interested parties should escalate the issue through the formal Change Management escalation procedure.

Based on the above events, KPMG Consulting provides a review each of the major issues included in this Exception:

1. *Following its responses to important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change.*

Appendix A shows that the original CR form lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, products, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001. In the absence of the above information and/or documentation, CLECs were unable to adequately prepare for the proposed change in advance of its implementation. Qwest's failure to conduct thorough research prior to initiating the CR necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for the proposed change. Based on the above observation, KPMG Consulting respectfully disagrees with Qwest's statement that CLECs had "more than six weeks" to make informed decisions and adapt to the proposed change.

2. *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change.*

KPMG Consulting observed that Qwest did not provide CLECs with adequate information in advance of the CR implementation. As shown in Appendix A, the original CR form, which CLECs expressly stated on October 17, 2001 would impact their business operations, lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, product, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001, and a follow-up meeting did not take place until November 26, 2001, four days before the CR's actual implementation. Qwest's failure to provide information necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby not affording CLECs adequate time to prepare for the proposed change.

3. *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

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KPMG Consulting understands that CLECs have invoked the Escalation Process with regard to the CR in question. Nonetheless, since Qwest did submit a CR through the CMP, the fact that Qwest implemented the change – in spite of CLEC objections – indicates that, within the overall CMP framework, there is a lack of clarity between what Qwest defines as a CR, and a Qwest unilateral notification of process change. In addition, Qwest was unable to answer all CLEC inquiries at the additional meetings held to discuss this CR in more detail. At the November 29, 2001 meeting, it was still uncertain whether or not the change would be implemented on December 1, 2001.

4. *Qwest, through the CMP, did not update CR status on a timely basis.*

Qwest distributed SYST.11.30.01.F.02444_CEMR_UG_Update at 10:39 AM MST on **December 3, 2001** (see Appendix B). On November 29, 2001, Qwest legal and change management staff indicated that Qwest would investigate whether or not the CR would be suspended, but did not provide CLECs with the status update until December 4, 2001, three days after the change had gone into effect. As of December 1, 2001, the CR status report on the Qwest CMP Web site did not indicate if CR PC100101-5 was suspended or implemented.

5. *Qwest CR includes rate changes that are not explicitly defined as within the scope of CMP.*

Qwest's response to this issue stated that the CR, itself, did not result in rate changes. However, the change in question is Qwest's implementation of a new testing process for Maintenance & Repair that results in Qwest's unilateral imposition of labor rates without CLEC agreement. The change potentially does have a significant financial impact on some CLECs. KPMG Consulting is aware that rate changes are not explicitly defined as within the scope of CMP, but would expect all Qwest-initiated CRs to follow the defined CMP Process.

KPMG Consulting did not observe Qwest's offer⁷ to enter into an amendment to interconnection agreements. KPMG Consulting reviewed the *Questions & Answers for Additional Testing 11/26/2001* document⁸, and was unable to locate information to support Qwest's statement. Instead, KPMG Consulting observed that Qwest repeatedly stated in meetings that the CR was a clarification of existing requirements, thus making an amendment unnecessary. For instance, at the October 31, 2001 meeting, one CLEC asked if Qwest had checked all existing interconnection agreements to ensure that the CR was consistent with Qwest's

⁷ Qwest quote from December 21st response: "Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way."

⁸ The *Questions & Answers for Additional Testing 11/26/2001* document is located at http://www.qwest.com/wholesale/downloads/2001/011128/QA_CR_PC100101-5OptTesting112601.doc.

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legal obligations. Qwest replied, “yes,” suggesting that no amendment was necessary.

KPMG Consulting recommends that this Exception remain open pending resolution of the above issues.

Qwest Response to KPMG Comments (01/25/02):

This Exception needs to be viewed in the unique context of the interim process for product and process changes in the Change Management Redesign process. During the redesign sessions, there was a misunderstanding regarding the scope of an interim process and the status of the CMP Redesign Team's discussions regarding that process. The redesign misunderstanding uniquely impacted the Additional Testing CR. As a result of that misunderstanding, the Additional Testing CR was initiated pursuant to the interim process established by the redesign team. Because of objections raised by CLECs in the redesign sessions, the Additional Testing CR was then handled pursuant to the process that existed before the redesign sessions began. As a result of the unique situation caused by the redesign misunderstanding, the issues raised in this Exception do not reflect the kind of systemic departure from procedure that is appropriately raised in an Exception. Further, the issues raised in this Exception appear to be confused by the inclusion of CLEC advocacy positions and/or requests in the factual recitation. The relevant facts are set forth below.

- Qwest initiated this CR under the *Interim Qwest Product/Process Change Management Process*.

As Qwest stated in its initial response, at the time Qwest issued this CR, Qwest believed that the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions might apply to the testing process clarification and, therefore, it submitted the CR. Since that time, it became apparent that the CLECs and Qwest had different understandings regarding the scope of the interim process. The CLECs and Qwest have spent a great deal of time in CMP Redesign Sessions discussing their respective positions regarding the interim process. During these sessions it became clear that the CLECs intended that the interim process should only apply to changes that were generated by the 271 workshops or OSS testing. Qwest agreed to this limitation on the scope of the interim process.

These discussions are reflected in the meeting minutes for the CMP Redesign Sessions held October 30 through November 1, 2001 (see pp. 2-3); November 13, 2001 (see p. 5); and November 27 through November 29, 2001 (see pp. 13-15). Copies of the discussion summaries from these minutes have been provided with this response or they may be located at the following URL under subheading Meeting Minutes, <http://qwest.com/wholesale/cmp/redesign.html>

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- Qwest processed this CR in accordance with the interim process until it became clear that the interim process did not apply.

The interim process requires that Qwest post its CR and related documentation to the CMP web site, and discuss it at the CMP Monthly Forum. The CLECs may raise any questions during the discussions and submit written comment through a mechanism on the web site. Any issues that are not resolved can be escalated.

Qwest followed the interim process by issuing the CR, discussing it at the CMP Monthly Forum, and posting the documentation changes on the CMP web site. Qwest also held meetings with the CLECs in addition to the CMP Monthly Forum in which Qwest answered CLEC questions relating to the CR. Qwest received no written comments through the web site mechanism. Qwest responded orally and in writing to the issues the CLECs raised in the several meeting that were held. These actions satisfied the interim process.

For ease of reference, a copy of the Interim Qwest Product-Process CMP document has been provided with this response or can be located at the following URL under Redesign Documentation, <http://qwest.com/wholesale/cmp/redesign.html>

- Qwest has also complied with the existing change management process.

By December 12, 2001, when this Exception was written, it was clear that the interim process did not apply. Thus, Qwest was not required to issue or process any CR in accordance with that process. Because the CMP Redesign team has not agreed to any other product/process procedures, the process that applies is the existing change management process. Under the existing process, Qwest must only provide notice before implementing a change (the existing process document titled Current CICMP has been provided with this response.) Qwest has gone far beyond that simple requirement by issuing the CR, holding several meetings to discuss the CR and answer CLEC questions, and issuing the documentation for comment.

- The remaining issues raised in this Exception do not change the analysis set forth above.

There are other issues raised in this Exception, such as KPMG's statement that there was confusion in the November 29, 2001 CMP Redesign Session regarding whether the CR would be implemented on December 1. The minutes for that meeting do not reflect any such confusion. Moreover, Qwest clearly stated at the end of the conference call held with the CLECs on November 26, 2001 to discuss the CR that it would implement the CR on December 1. There was no reasonable basis for any such confusion.

KPMG also points to a CLEC request for suspension of the CR. It is important to note that neither process required Qwest to delay or cancel implementation simply because a CLEC disagreed with or raised questions regarding Qwest's proposed change.

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Furthermore, Qwest has reviewed the change management processes of other companies, and no other process in the country, including processes reviewed by KPMG in other tests, includes a requirement that the ILEC suspend a proposed change if a CLEC objects to the change. Instead, any such issue upon which agreement could not be reached is required to be treated in the same way under the existing change management process and the interim product/process change management process: they are to be escalated. That is, in fact, what happened with this CR -- Eschelon and other CLECs initiated an escalation. This was the appropriate method for resolving any unresolved issues under both processes.

Attachments:

- ROC_TI764_EXP3094_Qwest INTERIM QWEST RODUCT-PROCESS_CMP-Revised_10-3-01_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Minutes Nov 27-29_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Nov 13 Final Minutes_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Oct 30-31 - Nov 1 Final Minutes_01_25_02.doc
- ROC_TI764_EXP3094_Current CICMP Doc Last Revised 05-11-01_01_25_02.doc

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KPMG Consulting's Second Response (02/12/02):

KPMG Consulting has reviewed Qwest's January 25, 2002 response along with the following referenced documents:

- (a) *Final CMP Redesign Meeting Minutes 10/30/2001 – 11/1/2001;*
- (b) *Final CMP Redesign Meeting Minutes 11/13/2001;*
- (c) *Final CMP Redesign Meeting Minutes 11/27/2001 – 11/29/2001;* and
- (d) *Interim Qwest Product/Process Change Management Process* dated 10/3/2001.

In addition, KPMG Consulting reviewed other meeting minutes and materials relevant to this Exception and available at the Qwest CMP Web site⁹:

- (e) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 10/17/2001;*
- (f) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 11/14/2001;*
- (g) *Change Management Process (CMP) Improvements – 11-26-01;*
- (h) *Final CMP Redesign Meeting Minutes 12/10/2001 – 12/11/2001;* and
- (i) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 12/12/2001.*

KPMG Consulting agrees with Qwest that the subject of this Exception needs to be considered in relation to the applicability of the interim process for product and process changes as part of the Change Management Redesign Process. Qwest has indicated, in its previous responses, that it believes that a Qwest CR was not necessary for this process change based on the scope and requirements of the Interim Product/Process CMP. Based upon discussions that were held November 27 – 29, 2001 and again on December 10 – 12, 2001, Qwest believed that the interim process applied only to changes related to Third Party Testing and to 271 workshops.

KPMG Consulting issued this Exception following an extensive review of facts and circumstances. In particular, KPMG Consulting published this Exception after December 1, 2001, the Qwest-scheduled implementation date for this process change, in order to observe the complete set of circumstances, processes, and activities related to CR PC100101-5. The Exception identifies a deficiency in the Change Management Process that will result in a negative comment for one or more of the evaluation criteria in the Final Report if left unresolved.

The specific process issues that KPMG Consulting has identified in this Exception include:

1. Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;

⁹ CMP Redesign documents are posted at: <http://www.qwest.com/wholesale/cmp/redesign.html>

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2. Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four business days for CLECs to prepare for the proposed change¹⁰;
3. Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension;
4. Qwest, through the CMP, did not update the CR's status on a timely basis;
5. Qwest's CR includes rate changes that are not explicitly defined to be within the scope of CMP.

KPMG Consulting provided a detailed review of each of these discussion items in the first response to this Exception on January 7, 2002. In its January 25, 2002 response, Qwest raised additional concerns surrounding the unique situation for the Additional Testing CR and for Change Management Redesign. KPMG Consulting offers additional comments to clarify the facts and background regarding the issuance of this Exception.

- **Qwest initiated the CR under the *Interim Qwest Product/Process Change Management Process*.**

Qwest implemented the Interim Product/Process CMP on October 17, 2001, the same day that Qwest first presented CR PC100101-5 for discussion with CLECs. According to the minutes from this meeting, Qwest stated that it had intended to issue a notification instead of a CR in order to implement the proposed change in 15 days instead of 45 days. Qwest had brought the issue forward as a CR in good faith for CLECs to have adequate advance review. Several CLECs stated that the proposed change would be CLEC-impacting, and requested Qwest to provide CLECs with complete information about the proposed change before counting days as part of the defined 45 day interval for notifying CLECs, for soliciting CLEC input, and for finalizing the change. Qwest later reaffirmed that the interim process for Qwest-initiated CRs was meant for all Qwest product/process changes that altered CLEC operating procedures¹¹.

- **As of December 12, 2001, it was still unclear that the interim process did not apply. KPMG Consulting's understanding is that the interim process was in effect during the period in question (i.e., October 17, 2001 through December 12, 2001).**

Although Qwest stated on October 31, 2001 that it would delay implementation of the CR in question on December 1, 2001 to address CLEC concerns, Qwest had not resolved all of the regulatory, product, and documentation questions and scheduled another follow-up meeting for November 26, 2001. Meeting minutes indicate that the discussion about the disagreement over the interim process had not begun until November 27, 2001, after Qwest had already scheduled implementation of CR PC100101-5. In this case,

¹⁰ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

¹¹ See Final Meeting Minutes, CMP Process Re-design, October 30 – November 1, 2001.

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Qwest scheduled the change implementation date prior to making complete information available to CLECs and receiving their comments.

Based on a review of the minutes from the three Change Management Redesign sessions held prior to the CR's implementation, KPMG Consulting believes that CLECs and Qwest did not reach consensus about the degree of decision-making authority CLECs would have in modifying or suspending Qwest-initiated CRs¹². In fact, it was in response to the objections with this CR and the degree of input into the process that the CLECs considered limiting the scope of the interim process in December.

KPMG Consulting does not consider meeting minutes which provide written record of opinions and open discussion about the Change Management development to serve as a proxy for the formalized process that was in place at the time that this change occurred. Furthermore, there does not appear to be conclusive language in the minutes to suggest that the Interim process did not apply as of December 1, 2001.

Qwest issued two documents that suggest the approach for Qwest-initiated process CRs had not changed. One document lists all CMP improvements that were effective or scheduled to be implemented as of November 26, 2001¹³. The Qwest-initiated Product and Process CR Process is cited as being implemented October – November, 2001. The other document describes the process by which baseline elements of the redesign effort may occur prior to the completion of the CMP redesign effort¹⁴. The document states that implementing baseline changes requires agreement among Core Team members and an implementation presentation for the general CLEC community.

KPMG Consulting considers Change Management to be an essential element of ongoing CLEC business operations and of the Qwest-CLEC business relationship. Because it governs an important part of all CLEC interaction with Qwest, KPMG Consulting would expect, at a minimum, that Qwest CMP would feature the following functions:

- Qwest notifies CLECs of all CLEC-impacting changes with complete information and sufficiently in advance of such changes;
- CMP includes the procedures through which Qwest takes into consideration the feedback from CLECs on all proposed CLEC-impacting changes; and
- CLECs have the opportunity to modify, discuss, and escalate issues encountered with proposed changes.

In response to this Exception, Qwest stated that it was not aware of CLEC objections to CR 100101-5 because Qwest did not receive any written comments through the Web-based PCAT documentation review mechanism. However, the Redesign meeting

¹² Quote from *Final CMP Redesign Meeting Minutes 11/13/2001*: "Schultz cited that there did not appear to be agreement between the CLEC community concerning the Qwest initiated product/process CR process."

¹³ See Appendix B: *Process to Deploy Qwest CMP Improvements – 11-26-01*.

¹⁴ See Appendix C: *Change Management Process (CMP) Improvements – 11-26-01*.

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minutes clearly demonstrate that CLECs were dissatisfied with both the change in question and with the overall process for managing Qwest-initiated CRs. Qwest Change Management representatives, who act as Qwest's point of contact, were present at these meetings. After having heard CLEC objections, none of the Qwest representatives had advised CLECs to escalate the CR in question until December 4, 2001¹⁵, three days after implementation, thus leaving CLECs wondering if Qwest was going to respond to CLECs by suspending the proposed change.

Due to differences in scope and history among ILEC change management processes, KPMG Consulting considers it inappropriate to compare Qwest CMP to that of other ILECs. As part of 271 OSS Testing effort, KPMG Consulting is evaluating Qwest CMP based on a pre-determined framework of evaluation criteria. Based on Qwest's latest response and the current state of Product/Process CMP, at least one KPMG Consulting evaluation criteria for Test 23 would be assessed "Not Satisfied." KPMG Consulting points to the CLEC request for suspension of the CR as an example of the collaborative extent of CMP and the ineffectiveness of the process to address disputes such as this. The Exception is not based on a requirement that an ILEC suspend a proposed change if the CLEC objects to the change.

KPMG Consulting considers the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹⁶ about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

KPMG Consulting reviewed aforementioned documents and identified that Qwest did not adhere to the expectations of a well-formed, functioning Qwest-CLEC change management process.

KPMG Consulting recommends that this Exception remain open pending implementation of and observation of adherence to a complete process for Qwest-initiated Product and Process Change Requests.

¹⁵ In response to CLEC inquiry to Judy Schultz and Laura Ford, Qwest advised Eschelon to escalate the CR in question in an email dated December 4, 2001, at 7:13 PM.

¹⁶ KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to February 2002.

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APPENDIX A

Co-Provider Change Request Form

Log # PCCR100101 Status: Submitted

-5

Submitted By: Debra Smith

Date 10/01/01

Submitted: _____

Co-

Provider: _____

Internal Ref# _____

Submitter: Debra Smith, Qwest Unbundled Loop Product Manager, dssmith@qwest.com,
515-241-1206

Name, Title, and email/fax#/phone#

Proprietary for submission to Account Manager Only? Please check mark as appropriate

☐ Yes ☐ No

Title of Change:

Clarification of Additional Testing Process

Area of Change Request: Please check mark as appropriate and fill out the appropriate section below

☐ System ☐ Product ☒ Process

System Change Request Section

Interfaces Impacted: Please check mark as appropriate

☐ CEMR

☐ IMA EDI

☐ MEDIACC

☐ TELIS

☐ EXACT

☐ IMA GUI

☐ Product Database

☐ Wholesale Billing

☐ HEET

☐ Directory Listings

☐ Other

Interfaces

Please
describe

Description of Change:

Is new information requested in a specific screen or transaction?

☐ Yes ☐ No

If yes, name the screen or
transaction: _____

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Products Impacted: Please check mark as appropriate and also list specific products within product group, if applicable

<input type="checkbox"/> Centrex	_____	<input type="checkbox"/> Resale	_____
<input type="checkbox"/> Collocation	_____	<input type="checkbox"/> SS7	_____
<input type="checkbox"/> EEL (UNE-C)	_____	<input type="checkbox"/> Switched Services	_____
<input type="checkbox"/> Enterprise Data Services	_____	<input type="checkbox"/> UDIT	_____
<input type="checkbox"/> LIDB	_____	<input type="checkbox"/> Unbundled Loop	_____
<input type="checkbox"/> LIS	_____	<input type="checkbox"/> UNE-P	_____
<input type="checkbox"/> LNP	_____	<input type="checkbox"/> Wireless	_____
<input type="checkbox"/> Private Line	_____	<input type="checkbox"/> Other	_____
	Please describe		Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation ASAP- High

Date: _____

Product Change Request Section

Products Impacted: Please check mark all that apply (if "Other" please describe further)

<input type="checkbox"/> LIS/Interconnection	<input type="checkbox"/> Collocation	<input type="checkbox"/> UNE	<input type="checkbox"/> Ancillary	<input type="checkbox"/> Resale
<input type="checkbox"/> EICT	<input type="checkbox"/> Physical	<input type="checkbox"/> Switching	<input type="checkbox"/> AIN	
<input type="checkbox"/> Tandem Trans./TST	<input type="checkbox"/> Virtual	<input type="checkbox"/> Transport (incl. EUDIT)	<input type="checkbox"/> DA	
<input type="checkbox"/> DTT/Dedicated Transport	<input type="checkbox"/> Adjacent	<input type="checkbox"/> Loop	<input type="checkbox"/> Operation Services	
<input type="checkbox"/> Tandem Switching	<input type="checkbox"/> ICDF Collo.	<input type="checkbox"/> UNE – P	<input type="checkbox"/> INP/LNP	
<input type="checkbox"/> Local Switching	<input type="checkbox"/> Other _____	<input type="checkbox"/> EEL (UNE-C)	<input type="checkbox"/> Other _____	
<input type="checkbox"/> Other _____		<input type="checkbox"/> UDF		

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

☐
Other _____

Description of Change:

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation

Date: _____

Process Change Request Section

Area Impacted: Please check mark as appropriate

☐ Pre-Ordering

☐ Ordering

☐ Billing

☒ Repair

☐

Other _____

Please describe

Description of Change:

Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.

If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point

This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux.

Products Impacted: Please check mark as appropriate and also list specific products within product group, if applicable

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

<input type="checkbox"/> Centrex	_____	<input type="checkbox"/> Resale	_____
<input type="checkbox"/> Collocation	_____	<input type="checkbox"/> SS7	_____
X EEL (UNE-C)	_____	<input type="checkbox"/> Switched Services	_____
<input type="checkbox"/> Enterprise Data	_____	X UDIT	_____
Services	_____		_____
<input type="checkbox"/> LIDB	_____	X Unbundled Loop	_____
<input type="checkbox"/> LIS	_____	<input type="checkbox"/> UNE-P	_____
<input type="checkbox"/> LNP	_____	<input type="checkbox"/> Wireless	_____
<input type="checkbox"/> Private Line	_____	<input type="checkbox"/> Other	_____
	Please describe		Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation

Date: _____

This Section to be Completed by Qwest CICMP Manager

Qwest Account Manager Notification

Account Manager: _____ Notified: _____

Qwest CICMP Manager Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Co-Provider Industry Team Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Status, Evaluation and Implementation Comments:

10/01/01 – CR received by Deb Smith of Qwest
10/01/01 – CR status changed to Submitted
10/01/01 – Updated CR sent to Deb Smith

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

☐ Yes ☐ No

**Candidate for a
Release**

If yes, Release

Number: _____

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

APPENDIX B

Process to Deploy Qwest CMP Improvements– 11-26-01

As Change Management Process redesign elements (major sections of the Master Redlined CMP Redesign framework) are discussed and baseline language is determined, Qwest and/or a CLEC-Core Team representative may propose to implement the baseline element. This request may occur prior to the completion of the CMP redesign effort. The CMP Redesign Core Team shall comply with the following process for implementing baseline changes:

- The Core Team reaches agreement to implement a given baseline element and determines the implementation date.
- Qwest develops an implementation presentation for the general CLEC community.
 - The Implementation Presentation shall include:
 - Language from the master redlined CMP framework
 - Other pertinent information, if applicable
 - Implementation/effective date
- At the next Monthly CMP meeting, Qwest and the Re-design Core Team will collectively present the proposed change. The Team shall seek comments, if any, from the general CLEC community.
- If there are no objections, Qwest shall implement the changes in accordance with the implementation plan.
- If there are objections, the Re-design Core Team will consider the input, and determine the appropriate course of action.

At the conclusion of the Re-design effort, the Core Team will present the Final Master Red-Line document to the general CLEC community for review and acceptance.

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

APPENDIX C

Change Management Process (CMP) Improvements – 11-26-01

Improvement	Implementation Date(s)
Standard Naming Convention	August 2001
Web Site Improvements <ul style="list-style-type: none">- Design- Search Capabilities	October 2001
CMP Process Improvements <ul style="list-style-type: none">- CR Clarification Meetings- Meeting Distribution Package- Meeting Minutes- CR Tracking and Reporting Database- CR Project Management	August – November 2001
Escalation and Dispute Resolution Process <ul style="list-style-type: none">- Process- Web Site	November 2001
Exception Process	September 2001
OSS Interface 12 Month Development View	November 2001
CLEC/Qwest Initiated OSS Interface CR Process <ul style="list-style-type: none">- Process- Form	October – November 2001
CLEC/Qwest Initiated Product and Process CR Process <ul style="list-style-type: none">- Process- Form	October – November 2001
PCAT Red-Line	November 2001
Tech-Pub Red-Line	October 2001
Point of Contact List	October 2001
Established CMP Full Day Meetings	October 2001
Prioritization of Qwest Originated OSS Interface CRs	August – November 2001
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments on CRs	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface <ul style="list-style-type: none">- Draft Technical Specifications Walkthrough- CLEC Comment Cycle- Final Technical Specifications- CLEC Testing	Effective with IMA 10.0 Release
Changes to an Existing GUI <ul style="list-style-type: none">- Draft User Guide- CLEC Comment Cycle- Final User Guide	Effective with IMA 10.0 Release

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

OSS IMA EDI Versioning	In Effect
Interface Testing Environment - SATE	In Place

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date (as OBS 3044): November 1, 2001
First Response Date (as OBS 3044): December 17, 2001
Initial Release Date (as EXC 3102): December 17, 2001
First Response Date (as EXC 3102): January 16, 2002
Second Response Date (as EXC 3102): February 11, 2002

Exception 3102 was initially released as Observation 3044 on November 1, 2001. KPMG Consulting recommended on December 17, 2001 that Observation 3044 be closed and moved to Exception 3102.

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Practices Verification and Validation Review, MTP Test 23.

Exception:

Qwest's internal OSS interface change management documentation is inconsistent and unclear.

Background:

Qwest utilizes an internal OSS change management process to manage the succession of four major phases of work—to initiate, develop, deploy, and retire changes in an OSS interface, as listed in the *Change Management Process (CMP) document*.¹ All requests for changes to Qwest's systems or processes, including those requests from Qwest business units and the software release candidates originated by CLECs, necessitate the creation of a Change Request (CR). These issues are logged into Qwest's internal database for tracking purposes. In order to enter change items into this database, several pieces of information are required, such as the type of change (category), associated working project (software life cycle), severity level (importance and scope), and priority (significance and timeframe).

As part of the relationship management process testing evaluation, KPMG Consulting reviewed four internal Qwest documents that outline the processes for managing CRs². The document titles are as follows:

- *Interconnect Mediated Access (IMA) Change Management Plan*.³
- *EDI Development Change Request (CR) Process*.⁴
- *Interconnect Center of Excellence (ICOE) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs*.⁵

¹ The *CMP Document* defines the processes through which CLECs submit Change Requests and received Qwest Release Notifications. It is located at http://www.qwest.com/wholesale/downloads/2001/010514/CMP_Document_051401.doc.

² These documents are deemed by Qwest to be "Confidential" in nature, and as agreed upon in the MTP, specific information regarding their contents will not be publicly revealed.

³ Document dated January 2001, Version 1b

⁴ Document date and version number not provided

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

- *Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process.*⁶

Issues:

While the documents contain large portions of similar information, inconsistencies such as important definitions for CR types, categories, and database fields exist. For example, there is a variation between the number of DDTS project categories. Similarly, two documents refer to five types of CRs, while two other documents add a sixth type.

Other findings in the documents included the following:

- The documents lack essential information (i.e. date of publication, version, author, change log, assumptions) that may be used to reference their source and applicability.
- The codes and abbreviations are presented without clear definitions.
- The process descriptions and process flows are either missing or contain ambiguous information.
- The process definitions for handling CRs and communicating prioritization changes to stakeholders appear to be incomplete.

KPMG Consulting has provided examples of the issues revealed in this observation in a separate, confidential document.

Questions:

1. Is there a reason why the Qwest documents contain different information about similar topics?
2. Which document(s) does Qwest use to represent its change management process?
3. Please describe how Qwest moves issues (i.e. bug fixes, requirement gaps, system enhancements) relevant to CLECs through all phases of the Change Management Process.

Qwest Formal Response to OBS 3044 (11/15/01):

This Observation was written to address inconsistencies in documentation with regards to the handling of Change Requests. The internal documents the P-CLEC referenced are:

1. Interconnect Mediated Access Change Management Plan (IMA CMP),
2. EDI Development Change Request (CR) Process,
3. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs,
4. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process)

⁵ Document dated February 28, 2001, Draft 00.05

⁶ Document dated December 1, 2000, Version 00.03

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

The IMA CMP document is being enhanced and will absorb the information that was previously contained in the IMA Basic Classifications of DDTS CRs and the Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process) document. Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for DDTS usage in IMA.

The inconsistent findings that were noted in the 'Issues' section of this Test Incident are noted and understood. The updated IMA CMP will focus on the following procedures:

- version control to maintain essential information
- definition of any codes and/or abbreviations
- where needed, concise process descriptions and flows will be available
- complete definitions and communication methods regarding the Change Request process

The EDI Development Change Request (CR) Process, has been re-located. This information may now be found in Chapter 17 of the EDI Development Handbook. A cross reference to the EDI development CR process will also be included in the IMA CMP.

1. Is there a reason why the Qwest documents contain different information about similar topics?

Yes, these documents differ in scope, content, are written at different levels and utilized by different groups. They also have since evolved into more comprehensive documents.

- 1.1. Interconnect Mediated Access (IMA) Change Management Plan (IMA CMP)

The IMA CMP is the main source of information and reflects current change management flow. It defines the steps to follow in the day to day administration of change management processes. This document will be updated to reflect planned changes to the change management flow and will remove inconsistencies mentioned in this TI. The updated IMA CMP will contain a reference to the EDI Development CR process, now found in Chapter 17 of the EDI Developers Handbook.

- 1.2. EDI Development Change Request (CR) Process

This information is now found in Chapter 17 of the EDI Developers Handbook, and will reference the IMA CMP for a broader view of the Change Request process.

This document focuses on EDI development processes and is a subset of the IMA CMP document that references CR categories and types.

For instance, the EDI Development CR Process references 25 CR categories, where the IMA CMP references 31 categories. This discrepancy is due to EDI developers using a subset of the categories found in the IMA CMP. Different subsets exist because development groups follow their own developmental analysis prior to handing their CRs to the larger IMA CR process. The IMA CR process, as identified in the IMA CMP, is then followed.

- 1.3. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

The IMA Basic Classifications of DDTS CRs is a document currently being used in tandem with the current version of the IMA CMP document and will be incorporated into the IMA CMP. The IMA Basic Classifications of DDTS CRs is scheduled to be retired on December 1, 2001.

1.4. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process

This document was in a draft form in July of this year and was being used by the IMA System Test organization. Qwest has since decided to incorporate that information into the IMA CMP. The processes referenced in it were equivalent processes referenced in the IMA CMP. The IMA Process Description & Specification, Change Request (CR) Process is scheduled to be retired on December 1, 2001.

2. Which document(s) does Qwest use to represent its change management process?

Qwest IMA refers to the IMA Change Management Plan. This document is currently being updated to reflect current change management flow. Until this document has been completed, Qwest IMA refers to the current IMA CMP in conjunction with the Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs.

3. Please describe how Qwest moves issues (i.e., bug fixes, requirement gaps, system enhancements) relevant to CLECs through all phases of the Change Management Process.

The steps that CLECs employ are found at the Wholesale System web-site found at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>. Once the Change Request has been initiated by the CLEC, the steps utilized by Qwest IMA are detailed in the current version of IMA CMP (and will also be incorporated in the updated version). They are provided below for your reference:

All bug fixes, requirement gaps and enhancements follow the same lifecycle.

1. The author / representative of the fix, requirement gap or enhancement creates a Change Request that outlines the issue at hand.
2. The CR is recommended for a Release or a Patch.
3. Preliminary effort estimates are prepared.
4. The CR is fully defined.
5. The effort estimate to fully implement the CR is developed.
6. The CR is reviewed and approved to be included in:
 - 6.1. *the initial Packaging of a Release*
 - 6.2. *added to a Release in Progress*
 - 6.3. *deployed as a Production Patch*

In summary, the following documents have been addressed:

1. Updated Interconnect Mediated Access Change Management Plan (IMA CMP). Since this document reflects an internal process, it will be sent to the P-CLEC via the Confidential Information Data Request process on December 1, 2001.

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

2. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs will be retired on December 1, 2001. Since this document is an internal document, a Notification regarding its retirement will not be published to the CLEC community.
3. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process will be retired on December 1, 2001. Since this document is an internal document, a Notification regarding its retirement will not be published to the CLEC community.
4. The information found in the EDI Development Change Request (CR) Process now located in Chapter 17 of the EDI Developers Handbook. The EDI Development Handbook is an internal document, and will be sent to the P-CLEC via the Confidential Information Data Request process on December 1, 2001.

Qwest First Supplemental Response OBS 3044 (11/29/01):

In Qwest's previous response dated 11/15/01, the summary section stated that the updated Interconnect Mediated Access Change Management Plan (IMA CMP) and the EDI Developers Handbook would be sent to the P-CLEC⁷ on December 1, 2001. Since this falls on a Saturday, Qwest will send the document via the Confidential Information Data Request process on Monday, December 3, 2001.

Qwest Second Supplemental Response OBS 3044 (12/04/01):

Qwest indicated in the 11/15/01 response that the following documents would be retired on 12/1/01:

- *Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs*
- *Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process*

Both documents were retired on 12/1/01. As was mentioned in the 11/15/01 response, no notification of the retirement was issued to the CLEC community because both documents were internal to Qwest.

In addition, Qwest indicated that two documents would be provided to KPMG via the DR process:

- *The Interconnect Mediated Access Change Management Plan (IMA CMP) will be provided via data request CM25 by 12/4/01.*
- *The EDI Developers Handbook (including the EDI Development Change Request (CR) Process) was provided via data request CM26 on 11/30/01.*

⁷ This should read KPMG Consulting instead of P-CLEC.

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

KPMG Consulting's First Response to OBS 3044 (12/17/01):

KPMG Consulting reviewed Qwest's responses, and noted the following issues with Qwest documents:

IMA CMP

KPMG Consulting acknowledges the enhancement of the *IMA CMP* to absorb the information that was previously contained in *IMA Basic Classifications of DDTS CR* and the *IMA Process Description & Specification CR Process*, as well as the retirement of the latter two documents. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. In its formal response, Qwest stated that the observation issues were noted and understood⁸. However, KPMG Consulting identified the following inconsistencies in the latest Version 1.00 of *IMA CMP*, dated November 30, 2001⁹. For illustration purpose, we are providing an example associated with each issue, where applicable:

1. Version control does not reflect previous version 1a and 1b¹⁰.
2. The document lacks a change log to document the changes made since version 1b.
3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.
4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram Consolidated Change Request Flow (Figure 1.1).
5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing¹¹.
6. The document excludes essential change management process information¹².
Specifically:
 - The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates.

⁸ Qwest quote in 4th paragraph of formal response (see page 3 in this document).

⁹ Qwest Quote: "IMA CMP is the main source of information and reflects current change management flow. It defines steps to follow in the day to day administration of change management processes. This document will be updated to reflect planned changes to the change management flow and will remove inconsistencies mentioned in this TI".

¹⁰ Qwest quote: "The updated IMA CMP will focus on the following procedures...version control to maintain essential information". The latest version presented to KPMG Consulting following version 1b was version 1.00.

¹¹ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

¹² Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA".

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

For example, no timeline for announcing CR prioritization or changes to a CR status is provided¹³.

- The document lacks process flows. For example, no process flow for production support or CR prioritization is presented¹⁴.
 - The document lacks entry and exit criteria for processes.
 - The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.
 - The document does not describe what tools are used to effectively manage change requests and trouble tickets.
7. The document does not address the last three issues identified in the “Confidential Information” section of KPMG Consulting’s initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

KPMG Consulting acknowledges the current CMP re-design process, the effort that Qwest and CLECs have initiated, and the timeline that has been established to conclude the re-design efforts. However, KPMG Consulting cannot validate that changes were made to Qwest internal documentation to reflect or identify issues discussed and documented in the current redline CMP document¹⁵.

KPMG Consulting would expect that, in order to accommodate changes in operations, and to include points of interaction with the CLEC community, current Qwest documents include, at a minimum, the various CLEC touch-points at which the internal OSS interface change management process interacts with the external change management process that is undergoing restructuring. If, as Qwest has stated, the current *IMA CMP* document is the main source of information, and reflects current change management flow¹⁶, then the following processes do not appear to be adequately documented:

- Notification procedures, including intervals;
- Escalation procedures, including intervals;
- Restoration procedures, including intervals;
- Prioritization procedures, including intervals;
- Documentation Management procedures, including intervals;
- Production Support procedures, including intervals;
- Major release and point release procedures; and
- Testing procedures, including test environments.

¹³ Qwest quote: “The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process”.

¹⁴ Qwest quote: “The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided”.

¹⁵ The current Draft CMP can be found at <http://www.qwest.com/wholesale/cmp/redesign.html> under the heading “Re-design Documentation.”

¹⁶ Qwest quote in section 1.1 of formal response (see page 3 in this document).

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Qwest OSS Evaluation

EDI Developer's Handbook

KPMG Consulting acknowledges Qwest's incorporation of the *Development CR Process* into chapter 17 of the *EDI Developer's Handbook*. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. However, the document does not demonstrate how Qwest consistently integrates CLEC-initiated CRs with Qwest internal CRs. Based on a review of this document, it appears that Qwest conducts the CR categorization, prioritization, and approval processes without CLEC input.

The Qwest Change Management Process (CMP) is the process by which CLECs initiate updates and enhancements to Qwest OSS interfaces. The process document in question, as indicated by Qwest's response, "is the main source of information" and "defines the steps to follow in the day to day administration" of the Qwest internal OSS change management process. It is critical that the internal OSS change management process be clearly documented and well formed for the management and implementation of changes requested by CLECs. In the absence of a framework to evaluate, categorize, and prioritize proposed changes, there is no assurance that Qwest OSS functionalities are enhanced to consistently meet the needs of CLEC business operations.

Attachments: None

Qwest Formal Response to EXP 3102 (12/28/01):

Qwest has provided the IMA Change Management Plan and the IMA EDI Developer's Handbook in response to Exception 3102. These documents define processes and procedures internal to the Interconnect Mediated Access (IMA) system. The scope of these documents is limited to the management of changes within IMA. All interaction between Qwest and CLECs, including CLEC initiated Change Requests (CRs) and trouble tickets, prioritization of CRs, communication of status, etc., is defined and managed through the Qwest Wholesale CMP and is beyond the scope of the IMA documents in question.

Qwest will, however, address KPMG's comments (items 1 through 5 and item 6, bullet points 3 and 5 above) specific to the IMA CMP.

As the issues in items 6 (bullet points 1, 2, and 4) and 7 are beyond the scope of the IMA documents in question, Qwest will indicate the appropriate Wholesale CMP documents and processes that address KPMG's concerns.

IMA CMP

The following is Qwest's response to KPMG comments specific to IMA documents. Qwest's response is outlined below, with KPMG's statements in italics:

1. *Version control does not reflect previous version 1a and 1b¹⁷.*

¹⁷ Qwest quote: "The updated IMA CMP will focus on the following procedures...version control to maintain essential information". The latest version presented to KPMG Consulting following version 1b was version 1.00.

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

Qwest Response: The previous IMA CMP versions (1a and 1b) were never baselined or approved, therefore no reference to unapproved versions are necessary in the Document History of this new Baselined Version 01.00.00 dated November 30, 2001.

2. *The document lacks a change log to document the changes made since version 1b.*

Qwest Response: The previous IMA CMP versions (1a and 1b) were never baselined or approved, therefore no reference to unapproved versions are necessary in the Document History of this new Baselined Version 01.00.00. Subsequent changes will be logged in the Document History on page 2.

3. *The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.*

Qwest Response: Using the "Office 97" version of MS Word to open the subject document, the IMA Change Request Life Cycle starts on page 6, as indicated in the Table of Contents.

4. *The Table of Figures references figures that do not exist. For example, the document does not include the diagram Consolidated Change Request Flow (Figure 1.1).*

Qwest Response: All figures in the Table of Figures exist and are present in the document. In some versions of MS Word, the Visio application requires the user to click into the area where the imported diagram resides. Qwest will provide a separate copy of Figure 1.1 via the normal data request process.

5. *Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing¹⁸.*

Qwest Response: These will be added to the IMA CMP, Section 8, Definition of Terms, by January 11, 2002.

6. *The document excludes essential change management process information¹⁹. Specifically:*

- *The document lacks entry and exit criteria for processes.*

Qwest Response: Entry and exit criteria are provided in documented processes. Since the IMA CMP is a plan, it does not provide that level of detail. An example of a documented process is the document identified as the seventh reference and titled, "System Test CR Verification Procedure". Qwest will provide a copy of this document via the normal data request process.

- *The document does not describe what tools are used to effectively manage change requests and trouble tickets.*

Qwest Response: DDTS is the tool used to manage change requests. The "ClearDDTS Users Guide" is the first document indicated under References, cited in Section 8, Definition of Terms, under "DDTS". The "Creation and Administration of Process-related DDTS Change Requests Process" is the fifth Reference, which is cited in Section 2.g.6 in the body of the IMA CMP. Change requests logged in DDTS include a reference to trouble tickets where appropriate.

¹⁸ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

¹⁹ Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA".

EXCEPTION 3102 – SECOND RESPONSE

Qwest OSS Evaluation

Trouble tickets are initiated by the Wholesale Systems Help Desk and managed in Problem Change Request Management (PCRM).

7. *The document does not address the last three issues identified in the “Confidential Information” section of KPMG Consulting’s initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.*

Qwest Response: These issues targeted the old, non-baselined version 1b of the IMA CMP, and have been resolved in the new baselined IMA CMP version 01.00.00. Qwest further responds to Item #7 in Confidential Attachment A.

The following is Qwest’s response to KPMG comments specific to the Wholesale CMP process. Qwest’s response is outlined below, with KPMG’s statements in italics:

6. *The document excludes essential change management process information²⁰. Specifically:*
- The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided²¹.*

Qwest Response: The change management process is defined by Wholesale CMP process and described in the Wholesale CMP documents “Changes To Existing OSS Interfaces” and “Qwest Proposed CR Prioritization Language” (Attachments B and C). The Wholesale CMP process (not the IMA Change Management Plan) defines this process.

- The document lacks process flows. For example, no process flow for production support or CR prioritization is presented²².*

Qwest Response: Qwest and the CLECs are currently negotiating the Wholesale CMP redesign. Qwest anticipates that this effort will be completed by January 31, 2002. This date is tentative and is dependent on satisfactory participation and cooperation of the CLECs. Qwest will complete a Wholesale CMP Methods and Procedures document approximately 30 days after the completed Wholesale CMP redesign. The Methods and Procedures document will include the process flows cited by KPMG as missing.

- The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.*

Qwest Response: Testing is addressed in the Wholesale CMP document “Changes To Existing OSS Interfaces”, Section I (Attachment B).

- KPMG Consulting would expect that, in order to accommodate changes in operations, and to include points of interaction with the CLEC community, current Qwest documents*

²⁰ Qwest quote: “Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA”.

²¹ Qwest quote: “The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process”.

²² Qwest quote: “The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided”.

EXCEPTION 3102 – SECOND RESPONSE

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include, at a minimum, the various CLEC touch-points at which the internal OSS interface change management process interacts with the external change management process that is undergoing restructuring. If, as Qwest has stated, the current IMA CMP document is the main source of information, and reflects current change management flow²³, then the following processes do not appear to be adequately documented:

Qwest Response: Due to the tentative process adopted in the CMP, the CMP process is the main source of information and not the IMA CMP.

EDI Developer's Handbook

- *KPMG Consulting acknowledges Qwest's incorporation of the Development CR Process into chapter 17 of the EDI Developer's Handbook. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. However, the document does not demonstrate how Qwest consistently integrates CLEC-initiated CRs with Qwest internal CRs. Based on a review of this document, it appears that Qwest conducts the CR categorization, prioritization, and approval processes without CLEC input.*

Qwest Response: The EDI Developer's Handbook is an internal document referenced in the IMA Change Management Plan (CMP). It is not intended to involve direct CLEC input, which occurs at the Wholesale and IMA levels, as indicated in the Qwest Wholesale Change Management Process, cited in the Scope of the IMA CMP and again in Section 6, OSS Supplier Change Request (CR) Management.

Attachment(s): To be sent via the Confidential DR Process

Qwest Supplemental Response (01/14/02):

Qwest committed to the following action item in the 12/28/01 response, under issue #5:

"[KPMG Comments] Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing²⁴.

[Qwest Response] These will be added to the IMA CMP, Section 8, Definition of Terms, by January 11, 2002."

Qwest completed the updates to the *IMA Change Management Plan* on 1/7/02. Qwest will provide KPMG the updated document via the data request process by 1/15/02 (DR # TI-777S1 – EXP 3102).

Attachment(s):

KPMG Consulting First Response to E3102 (01/16/02):

KPMG Consulting reviewed Qwest's response, along with information provided in relation to the confidential portion of this report. KPMG Consulting's response is comprised of two parts, a

²³ Qwest quote in section 1.1 of formal response (see page 3 in this document).

²⁴ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

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process review and a documentation review. The confidential portion of the documentation review includes Attachment A, submitted to Qwest separately through the data request process.

OSS Interface Change Management Process Review

KPMG Consulting recognizes Qwest's position that the scope of the IMA Change Management Plan and the IMA EDI Developer's Handbook is limited to the processes and procedures internal to the Interconnect Mediated Access (IMA) system. Qwest draws a distinction between the Wholesale Change Management Process (CMP) that is currently undergoing redesign, and the internal processes that are used to manage IMA changes within Qwest. Qwest identified the specific issues (four of the eleven total) raised in KPMG Consulting's first response that it considers out of scope for the *IMA CMP* document. Qwest did, however, provide a response to all of KPMG Consulting's comments.

Although KPMG Consulting agrees that the internal process is not the main focus of the OSS Change Management Test, it contends that the test scope should include an analysis of how Qwest formally applies changes to OSS interfaces, including IMA for EDI and GUI. By definition, the management of changes to IMA involves the Change Management Process. KPMG Consulting does not agree that the two change processes (i.e., internal and external) can be considered independently, but instead maintains that they should be adequately integrated and include consistent sub-processes.

The January 17, 2002 Systems CMP Team Meeting Distribution Package²⁵ contains references to multiple IMA Change Requests initiated by CLECs and Qwest. IMA continues to be the primary vehicle or interface system by which CLECs submit their pre-orders and orders to Qwest. Therefore, KPMG Consulting believes that the adequacy of the methods by which Qwest's internal process is documented and operated, especially within the context of both CLEC-initiated and Qwest-initiated changes, has direct relevance to how these changes are managed for the external, Wholesale CMP. The nature of KPMG Consulting's end-to-end testing is such that it does, at times, require a review of business processes internal to Qwest, but impacting to certain wholesale processes, such as Change Management.

If, as Qwest has stated, the current IMA CMP document is the "main source of information," and reflects current change management flow²⁶, KPMG Consulting contends that the following processes remain inadequately documented:

- a. Notification procedures, including intervals;
- b. Escalation procedures, including intervals;
- c. Restoration procedures, including intervals;
- d. Prioritization procedures, including intervals;
- e. Documentation Management procedures, including intervals;
- f. Production Support procedures, including intervals;

²⁵ Available at Qwest Wholesale Web site at the following URL:
<http://www.qwest.com/wholesale/downloads/2002/020111/ProductProcessJanDistPackage.pdf>

²⁶ Qwest quote in section 1.1 of formal response (see page 3 of this document).

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- g. Major release and point release procedures; and
- h. Testing procedures, including test environments.

IMA CMP Documentation Review

1. Version control does not reflect previous version 1a and 1b.²⁷

In its November 15, 2001 response, Qwest indicated that the *IMA CMP* document was to be enhanced, and would focus on version control to maintain essential information. In its December 28, 2001 response, Qwest stated that the *IMA CMP* versions (1a and 1b) had not been base-lined or approved and, therefore, would require no updates to the Document History. KPMG Consulting requests that Qwest provide a description of the steps taken to ensure document management controls for non base-lined and unapproved versions of *IMA CMP*, if such sub-processes exist. This request notwithstanding, KPMG Consulting maintains that this example represents a relatively insignificant problem related to documentation. As part of its retest, KPMG Consulting will review Qwest's January 15, 2002 version of the *IMA CMP* for version control.

2. The document lacks a change log to document the changes made since version 1b.

In its response, Qwest stated that the previous *IMA CMP* versions (1a and 1b) had not been base-lined or approved. KPMG Consulting would expect that future IMA documents clearly indicate whether or not they have been approved as official baselined documents.

3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.

In its response, Qwest stated that the document displayed correct page numbers with a particular version of MS Word. KPMG Consulting reviewed the revised hard copy and electronic versions of the document, and concludes that this issue is resolved.

4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).

In its response, Qwest stated that figures were present in the document, and that in some versions of MS Word, diagrams prepared with Visio do not display correctly. KPMG Consulting confirms receipt of Figure 1.1 on December 31, 2001, and receipt of the *IMA CMP* document on January 15, 2002. KPMG Consulting has determined that flowcharts are referenced appropriately, and can be read using Microsoft Word for Windows 2000 to view the displays. This issue is resolved.

5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing²⁸.

In its response, Qwest stated that the revised *IMA CMP* document would include relevant definitions for the above terms. KPMG Consulting will review the revised document for

²⁷ Qwest quote: "The updated IMA CMP will focus on the following procedures...version control to maintain essential information." The subsequent version presented to KPMG Consulting following version 1b was version 1.00.

²⁸ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations."

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descriptions of these and any new acronyms included in the document. (Qwest provided this document to KPMG Consulting on January 15, 2002).

6. The document excludes essential change management process information,²⁹ specifically:

- (a) The document lacks entry and exit criteria for processes.

In its response, Qwest stated that entry/exit criteria are included in documented processes (e.g., *System Test CR Verification Procedure*), but not in any of the documented plans (e.g., *IMA CMP*). KPMG Consulting confirms the receipt of the *System Test CR Verification Procedure* document on December 31, 2001. KPMG Consulting would expect to observe consistent definitions and levels of detail, across different document types, to support critical wholesale functions, such as how Qwest verifies and validates change requests for further processing and consideration. KPMG Consulting will review the *System Test CR Verification Procedure* document, along with the revised *IMA CMP* document, for entry and exit criteria..

- (b) The document does not describe what tools are used to effectively manage change requests and trouble tickets.

In its response, Qwest stated that DDTS is the tool used to manage change requests. The DDTS tool is documented in the *ClearDDTS Users Guide*. For Trouble Ticket management, Qwest uses PCRM, which is documented in *PCRM Description* document (DR ID147). KPMG Consulting requests that Qwest provide updated documentation for both applications (DDTS and PCRM) that document the processes, roles and responsibilities, and the manner in which the applications support CLECs. KPMG Consulting requests documentation that defines how Qwest processes (for Change Request Management and Trouble Ticket Management) support the integration of the Wholesale CMP with the Wholesale System Help Desk (WSHD) and other CLEC touch-points within the Qwest organization. Such documentation might include current process descriptions, roles and responsibilities, and how, specifically, the application supports Qwest in operating Change Management.

- (c) The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.³⁰

In its response, Qwest stated that the *Wholesale CMP* process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest.

- (d) The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.³¹

²⁹ Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA."

³⁰ Qwest quote: "The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process."

³¹ Qwest quote: "The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided."

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In its response, Qwest stated that it would complete a *Wholesale CMP Methods and Procedures* document within one month after the completion of CMP Redesign, and that the redesign effort is anticipated to be completed by January 31, 2002. KPMG Consulting understands that redesign meetings are scheduled at least through April 2002, but will review the *Wholesale CMP Methods and Procedures* document when it becomes available.

- (e) The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

In its response, Qwest stated that the *Wholesale CMP* process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest. This issue remains open until the above processes and procedures can be fully tested.

- 7. The document does not address the last three issues identified in the “Confidential Information” section of KPMG Consulting’s initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.**

Refer to confidential Attachment A for KPMG Consulting comments related to the documentation review.

EDI Developer’s Handbook Document Review

In its response, Qwest stated that the *EDI Developer’s Handbook* is an internal document, referenced in the *IMA CMP*, which does not involve direct CLEC input. This, according to Qwest, occurs at the *Wholesale CMP* and *IMA CMP* levels. Although KPMG Consulting recognizes the purpose of the referenced handbook, it requests that Qwest demonstrate and document the steps taken to ensure that Qwest-initiated, CLEC-impacting CRs are visible to CLECs. Likewise, Qwest has not yet provided a full description of the framework that Qwest uses internally to apply changes to the IMA interface with CLEC input. For example, CLEC input is required during CR prioritization and CR packaging for IMA releases. Qwest and CLECs are currently collaborating to define the details of this interaction in the CMP Redesign Workshops.

KPMG Consulting requests that Qwest submit the revised *EDI Developer’s Handbook* document for review. This issue is unresolved.

KPMG Consulting recommends that Exception 3102 remain open pending resolution of the issues identified above, as well as those identified in Attachment A.

Attachment(s): A (confidential)

Qwest Response to KPMG Comments to EXP 3102 (01/25/02):

Qwest reviewed KPMG Consulting’s 01/16/02 response to Exception 3102. Qwest’s response is outlined below, with KPMG’s statements in italics:

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OSS Interface Change Management Process Review

If, as Qwest has stated, the current IMA CMP document is the “main source of information,” and reflects current change management flow,” KPMG Consulting contends that the following processes remain inadequately documented:

- a. Notification procedures, including intervals;*
- b. Escalation procedures, including intervals;*
- c. Restoration procedures, including intervals;*
- d. Prioritization procedures, including intervals;*
- e. Documentation Management procedures, including intervals;*
- f. Production Support procedures, including intervals;*
- g. Major release and point release procedures; and*
- h. Testing procedures, including test environments.*

Qwest Response: As an initial matter, Qwest wishes to clarify a possible misunderstanding. In the comments above, KPMG Consulting referenced the statement made in Qwest’s 11/15/01 formal response, “The IMA CMP document is the main source of information and reflects current change management flow”. This statement was made in response to questions about four specific IMA documents. In its 12/17/01 response, KPMG Consulting discussed interaction with the CLEC community and CLEC touch points and questioned adequate documentation of the eight processes above. In the context of change management as it relates to CLECs, it is the external Wholesale CMP and not the internal IMA CMP that defines Qwest’s processes for supporting CLECs.

Second, to address concerns identified in KPMG’s “OSS Change Management Interface Process Review”, Qwest stresses that the external Wholesale CMP drives Qwest’s internal system processes. Thus, internal documentation that integrates Qwest’s internal processes with external CMP processes is dependent, to a large extent, on the external CMP documentation being in place. As KPMG is aware, the external systems CMP Redesign will soon be complete. Since KPMG Consulting would like Qwest to demonstrate a documented integration of external (CLEC facing) and internal change management processes, Qwest will provide a document to KPMG Consulting that defines the existing integration of external and internal processes by February 7, 2002.

IMA CMP Documentation Review

1. Version control does not reflect previous version 1a and 1b.

In its November 15, 2001 response, Qwest indicated that the IMA CMP document was to be enhanced, and would focus on version control to maintain essential information. In its December 28, 2001 response, Qwest stated that the IMA CMP versions (1a and 1b) had not been base-lined or approved and, therefore, would require no updates to the Document History. KPMG Consulting requests that Qwest provide a description of the steps taken to ensure document management controls for non base-lined and unapproved versions of IMA CMP, if such sub-processes exist. This request notwithstanding, KPMG Consulting maintains that this example represents a relatively insignificant problem related to documentation. As part of its

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retest, KPMG Consulting will review Qwest's January 15, 2002 version of the IMA CMP for version control.

Qwest Response: Working documents, prior to baselining, are version controlled in the IMA Document Repository, located on the local area network. Working documents contain a document change log, which records the revision history. Once the document is baselined, the revision history of the working document is deleted.

2. The document lacks a change log to document the changes made since version 1b.

In its response, Qwest stated that the previous IMA CMP versions (1a and 1b) had not been base-lined or approved. KPMG Consulting would expect that future IMA documents clearly indicate whether or not they have been approved as official baselined documents.

Qwest Response: Future IMA documents will indicate whether or not they have been baselined and approved.

3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.

In its response, Qwest stated that the document displayed correct page numbers with a particular version of MS Word. KPMG Consulting reviewed the revised hard copy and electronic versions of the document, and concludes that this issue is resolved.

Qwest Response: No Qwest action required.

4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).

In its response, Qwest stated that figures were present in the document, and that in some versions of MS Word, diagrams prepared with Visio do not display correctly. KPMG Consulting confirms receipt of Figure 1.1 on December 31, 2001, and receipt of the IMA CMP document on January 15, 2002. KPMG Consulting has determined that flowcharts are referenced appropriately, and can be read using Microsoft Word for Windows 2000 to view the displays. This issue is resolved.

Qwest Response: No Qwest action required.

5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing.

In its response, Qwest stated that the revised IMA CMP document would include relevant definitions for the above terms. KPMG Consulting will review the revised document for descriptions of these and any new acronyms included in the document. (Qwest provided this document to KPMG Consulting on January 15, 2002).

Qwest Response: No Qwest action required.

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6. The document excludes essential change management process information, specifically:

(a) The document lacks entry and exit criteria for processes.

In its response, Qwest stated that entry/exit criteria are included in documented processes (e.g., System Test CR Verification Procedure), but not in any of the documented plans (e.g., IMA CMP). KPMG Consulting confirms the receipt of the System Test CR Verification Procedure document on December 31, 2001. KPMG Consulting would expect to observe consistent definitions and levels of detail, across different document types, to support critical wholesale functions, such as how Qwest verifies and validates change requests for further processing and consideration. KPMG Consulting will review the System Test CR Verification Procedure document, along with the revised IMA CMP document, for entry and exit criteria.

Qwest Response: No Qwest action required.

(b) The document does not describe what tools are used to effectively manage change requests and trouble tickets.

In its response, Qwest stated that DDTS is the tool used to manage change requests. The DDTS tool is documented in the ClearDDTS Users Guide. For Trouble Ticket management, Qwest uses PCRM, which is documented in PCRM Description document (DR ID147). KPMG Consulting requests that Qwest provide updated documentation for both applications (DDTS and PCRM) that document the processes, roles and responsibilities, and the manner in which the applications support CLECs. KPMG Consulting requests documentation that defines how Qwest processes (for Change Request Management and Trouble Ticket Management) support the integration of the Wholesale CMP with the Wholesale System Help Desk (WSHD) and other CLEC touch-points within the Qwest organization. Such documentation might include current process descriptions, roles and responsibilities, and how, specifically, the application supports Qwest in operating Change Management.

Qwest Response: Qwest will provide a response to this issue by February 7, 2002.

(c) The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.

In its response, Qwest stated that the Wholesale CMP process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

(d) The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.

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In its response, Qwest stated that it would complete a Wholesale CMP Methods and Procedures document within one month after the completion of CMP Redesign, and that the redesign effort is anticipated to be completed by January 31, 2002. KPMG Consulting understands that redesign meetings are scheduled at least through April 2002, but will review the Wholesale CMP Methods and Procedures document when it becomes available.

Qwest Response: Qwest understands that KPMG will review the Wholesale CMP Methods and Procedures document, to be completed by Qwest within one month after the completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign is anticipated to be completed by January 24, 2002.

- (e) The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

In its response, Qwest stated that the Wholesale CMP process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest. This issue remains open until the above processes and procedures can be fully tested.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

- 7. The document does not address the last three issues identified in the “Confidential Information” section of KPMG Consulting’s initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

Refer to confidential Attachment A for KPMG Consulting comments related to the documentation review.

Qwest Response: To date, Qwest has not received confidential Attachment A, referenced on pages 12 and 16, and therefore is unable to further respond to these three issues.

EDI Developer’s Handbook Document Review

In its response, Qwest stated that the EDI Developer’s Handbook is an internal document, referenced in the IMA CMP, which does not involve direct CLEC input. This, according to Qwest, occurs at the Wholesale CMP and IMA CMP levels. Although KPMG Consulting recognizes the purpose of the referenced handbook, it requests that Qwest demonstrate and document the steps taken to ensure that Qwest-initiated, CLEC-impacting CRs are visible to CLECs. Likewise, Qwest has not yet provided a full description of the framework that Qwest uses internally to apply changes to the IMA interface with CLEC input. For example, CLEC input is required during CR prioritization and CR packaging for IMA releases. Qwest and CLECs are currently collaborating to define the details of this interaction in the CMP Redesign Workshops.

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KPMG Consulting requests that Qwest submit the revised EDI Developer's Handbook document for review. This issue is unresolved.

Qwest Response: Section 6 of the IMA CMP directs IMA staff to the process for making CLEC-impacting CRs visible to CLECs. Section 5 of the IMA CMP provides the linkage to the EDI Developer Handbook.

Attachment(s):

Qwest Supplemental Response to KPMG Comments for EXP 3102 (02/08/02):

In the January 25, 2002 response to KPMG comments, Qwest's response to the "OSS Interface Change Management Process Review", included a commitment to provide a document to KPMG Consulting that defines the existing integration of external and internal processes by February 7, 2002. This document is being provided via the usual data request process (DR no. TI-777S1).

In the January 25, 2002 response to KPMG comments, Qwest committed to respond to item 6(b) of the "IMA CMP Documentation Review" by February 7, 2002. Qwest's response is as follows:

ClearDDTS is a Rational Software product. The ClearDDTS Users Guide is Rational Software proprietary and can not be distributed by Qwest. ClearDDTS is a software enhancement and defect tracking tool used internally by Qwest to track the status of IMA CRs. ClearDDTS is used to support the efforts of Qwest personnel engaged in IMA development and production support and is not meant to support Qwest's relationship with CLECs.

In the "Proprietary Information" section of KPMG's January 22, 2002 response to Observation 3052 (TI 676), KPMG requested that Qwest provide additional information on the PCRM application. Qwest committed to provide this information in response to Observation 3052 (TI 676) by February 11, 2002. Qwest recommends that KPMG refer to the February 11, 2002 response to Observation 3052 (TI 676) to address the PCRM portion of item 6(b).

Attachment(s):

KPMG Consulting Second Response to E3102 (02/11/02):

As structured in previous responses to this Exception, KPMG Consulting's response is composed of two parts, a process review and a documentation review. KPMG Consulting sent Attachment A for this portion of the review to Qwest on January 30, 2002. There is no confidential portion included with this February 6, 2002 review. This Exception was the subject of discussion at an Observation and Exception focused call held on January 31, 2002.

OSS Interface Change Management Process Review

KPMG Consulting's position, that the internal and external change management processes are inter-related and should therefore be integrated with consistent and documented sub-processes, has not changed. KPMG Consulting believes that the formal management of changes applied to

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IMA EDI and IMA GUI involves the Wholesale Change Management Process, whether the change originates internally from Qwest or externally from CLECs.

KPMG Consulting interprets Qwest's clarification about the IMA CMP statement from a previous response³² to mean that this may have been a misstatement or that the original statement may have been taken out of context. Regardless, Qwest has reiterated the point that it is the external Wholesale CMP, and not the internal IMA CMP, that defines Qwest's processes for supporting CLECs. Qwest also stressed in its response that the external Wholesale CMP drives Qwest's internal system processes, including the IMA CMP. Thus, KPMG Consulting expects that internal documentation such as the IMA CMP or the new integration document include details about the sub-processes listed in reference items (a) through (h). KPMG Consulting will review the document that defines the integration of external and internal processes when it becomes available.

IMA CMP Documentation Review

1. Version control does not reflect previous version 1a and 1b.

Qwest Response: Working documents, prior to baselining, are version controlled in the IMA Document Repository, located on the local area network. Working documents contain a document change log, which records the revision history. Once the document is baselined, the revision history of the working document is deleted.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and confirms that version control is present. This issue is resolved.

2. The document lacks a change log to document the changes made since version 1b.

Qwest Response: Future IMA documents will indicate whether or not they have been baselined and approved.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and found versioning and baseline and approval status to be present. This issue is resolved.

3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.

This issue is resolved.

4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).

This issue is resolved.

5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and found that the document contains definitions of all referenced codes and abbreviations. This issue is resolved.

³² "The IMA CMP document is the main source of information and reflects current change management flow" Qwest 11/15/01 Response, Section 1.1, page 4 (of this KPMG Consulting 02-06-02 document).

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6. The document excludes essential change management process information, specifically:

- (a) The document lacks entry and exit criteria for processes.

Qwest Response: No Qwest action required.

KPMG Consulting reviewed the "System Test CR Verification Procedure" document, along with the revised "IMA CMP" document. The Qwest distinction between a process document and a plan document is not apparent. The referenced process document, "System Test CR Verification Procedure", identifies entry and exit conditions. The plan document, "IMA CMP", provides similar procedural detail and instructions as the "System Test CR Verification Procedure". However, KPMG Consulting was unable to locate entry and exit criteria. This issue remains unresolved.

- (b) The document does not describe what tools are used to effectively manage change requests and trouble tickets.

Qwest Response: Qwest will provide a response to this issue by February 7, 2002.

KPMG Consulting will review the updated DDTS and PCRM documents upon receipt. This issue remains unresolved.

- (c) The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

KPMG Consulting expects that this discussion will continue during the February CMP Redesign Workshops. The systems portion of the CMP Redesign effort was not concluded on January 24, 2002. This issue remains unresolved.

- (d) The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.

Qwest Response: Qwest understands that KPMG will review the Wholesale CMP Methods and Procedures document, to be completed by Qwest within one month after the completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign is anticipated to be completed by January 24, 2002.

KPMG Consulting will review revised Qwest documentation for process flows after it becomes available. This issue remains unresolved.

- (e) The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

KPMG Consulting will review revised Qwest documentation for Testing Support after it becomes available. This issue remains unresolved.

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7. The document does not address the last three issues identified in the “Confidential Information” section of KPMG Consulting’s initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

Qwest Response: To date, Qwest has not received confidential Attachment A, referenced on pages 12 and 16, and therefore is unable to further respond to these three issues.

Inadvertently, the confidential attachment was submitted to Qwest on January 30, 2002 instead of with the first supplemental response to Exception 3102 on January 16, 2002. KPMG Consulting apologizes for any inconvenience this may have caused.

The status of the three issues is as follows:

- (a) IMA CMP documentation issue

Issue is resolved.

- (b) IMA CMP process and consistency of detail issue.

This issue remains unresolved. KPMG Consulting issued Data Request CM32.

- (c) IMA CMP process and CLEC notification issue.

This issue remains unresolved. KPMG Consulting issued Data Request CM33.

EDI Developer’s Handbook Document Review

Qwest Response: Section 6 of the IMA CMP directs IMA staff to the process for making CLEC-impacting CRs visible to CLECs. Section 5 of the IMA CMP provides the linkage to the EDI Developer Handbook.

KPMG Consulting requests that Qwest include CLEC touch-points in the EDI Developer’s Handbook and submit the revised document for review. This issue is unresolved.

KPMG Consulting and Qwest held a focus call on Thursday, January 31, 2002. The purpose of the call was for Qwest to ask questions and for KPMG Consulting to clarify any major issues in Exception 3102. Qwest stated that a new “integration document” will address issues (a) through (h) listed in E3102 and provide the documented integration between the external Wholesale CMP and the Qwest internal change management processes. Participants of the call also clarified that depending on the progress of CMP Redesign, certain sections of the document may be incomplete.

KPMG Consulting will review the “integration document” when it becomes available for overall adequacy and completeness of the processes (a) through (h) identified in this Exception. .

KPMG Consulting recommends that Exception 3102 remain open pending resolution of the issues identified above.

EXCEPTION 3110

Qwest OSS Evaluation

Initial Release Date: January 24, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Change Management Review, MTP Test 23.

Exception:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.

Background:

Qwest utilizes the Mailout Notification System to distribute information that pertains to CLECs business operations. These notifications cover a wide range of topics including documentation updates, new product offerings, training availability, OSS planned outages, Qwest-CLEC meeting notices, Qwest's responses to CLEC-initiated change requests, and notices specifically concerning the Qwest Change Management Process (CMP). These distributions are critical to allow CLECs to make informed decisions about their business operations, as well as to maintain the Qwest-CLEC business relationship. CLEC representatives rely on accurate email headlines and timely notices to redistribute the emails within their respective organizations.¹

Issues:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications² that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:

¹ KPMG Consulting observed that, in response to CLECs' request during the CMP Redesign effort, Qwest implemented a standard naming convention for all Change Management email notifications beginning in August 2001.

² KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001. Four of them were repeated distributions, and thus, were excluded from this analysis.

EXCEPTION 3110

Qwest OSS Evaluation

1. Delayed distribution

KPMG Consulting identified 32 instances (28% of the total notifications reviewed) in which Qwest's date of a notification was earlier than its actual distribution, thus representing a delay. While the majority of these delays fell within one business day, KPMG Consulting identified 13 instances in which the delay exceeded two business days. Appendix A includes one notification that was dated December 10, 2001, but was distributed on December 27, 2001.

Email Headline	Document Date	Distribution Date
System: CEMR User's Guide Update, RN, Effective 11/30/01	11/30/2001	12/3/2001
Systems: IMA GUI Documentation Update, non-release related, 12/03/01	11/30/2001	12/3/2001
General: Meetings: RN: Collo Decommission Mtg on 12-12, Effective 12-4-01, Final	12/4/2001	12/5/2001
System: OSS Scheduled Mtc., Final 12/4/01	12/4/2001	12/5/2001
Change Management: Meeting: RN: Update from 11-30 Mtg on UNE-P Bulk Conversion, Effective 12-4-01, Final	12/4/2001	12/5/2001
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/5/2001	12/6/2001
System: OSS Scheduled Maintenance, 12/10/01	12/10/2001	12/11/2001
System: OSS Sched. Mtce. Weekend of 12/14, 12/12/01	12/11/2001	12/12/2001
System: IMA GUI 8.1 CTAG Users Guide Update 12/13/01	12/10/2001	12/13/2001
Process: Ordering: RN: Updates to Local Service Ordering Guidelines,	12/14/2001	12/17/2001
Product: UNE: RN: Update to Unbundled Local Loop PCAT, Effective December 17, 2001, Final	12/14/2001	12/17/2001
Process: Provisioning: RN: Update to Customer Not Ready Jeopardy Process, Effective December 14, 2001, Final	12/14/2001	12/17/2001
System: CEMR User's Guide Update, 12/14/01	12/14/2001	12/17/2001
System: Delayed Bill Post Notifications, 12/14/01	12/14/2001	12/17/2001
System: Digital Certificates & ECOM Doc, 12/14/01	12/14/2001	12/17/2001
Local Service Freeze Protection: AZ, IA, MN, MT, NE, NM, WY	12/17/2001	12/18/2001
DMT Qwest DSL Change Charge	12/14/2001	12/18/2001
Qwest DSL Service Promotion	12/14/2001	12/18/2001
Customer Premises Wire and Maintenance Plans	12/14/2001	12/18/2001

EXCEPTION 3110

Qwest OSS Evaluation

Email Headline	Document Date	Distribution Date
Residence VMS Service, Effective 1/2/01	12/14/2001	12/18/2001
Training: IMA Release 9.0, RN, 12/18/01	12/14/2001	12/18/2001
Business Competitive Response – IA	12/17/2001	12/19/2001
Process: Ordering: RN: Update to Service Interval Guide, Effective December 20, 2001, Final	12/19/2001	12/20/2001
Switch Conversion-Woodland Park, CO 1-12-02	12/20/2001	12/21/2001
Local Directory Assistance – MN	12/14/2001	12/26/2001
Residence Caller ID and Security Screen Promo - IA, NM, OR, MT	12/21/2001	12/27/2001
Meet the Due Date Promotion, Effective 2/1/02	12/26/2001	12/27/2001
Residence Caller ID and Security Screen Promotion -ND, CO, WY	12/21/2001	12/27/2001
2002 Q1 Business Promotion Resale Notice - AZ, CO, IA, MT, NM, OR, SD, UT, WA, WY	12/26/2001	12/27/2001
Synchronous Service Transport, STS 1 Multiplexing	12/21/2001	12/27/2001
Business Caller ID Promotion, Effective 1/21/02	12/21/2001	12/27/2001
Residence Competitive Response Promotion - Utah	12/10/2001	12/27/2001

2. *Erroneous topic*

KPMG Consulting observed one instance in which the email headline contained an inaccurate description of its contents. On December 3, 2001, at 5:14 PM MT, Qwest distributed an email with the headline, "Process: Ordering: RN: Update to Resale Database Info, Effective December, 3, 2001, Final." The notification included with the email was titled "Updated Information for Getting Started as a Wholesale Customer & the Negotiations Process" (Document No. PROS.12.03.01.F.00325.Getting_Started_&_Negotiations).

3. *Late notice of system changes*

KPMG Consulting reviewed 10 notifications related to system changes, and identified four instances in which Qwest notified CLECs following implementation of the associated patch or change.

Email Headline	Implementation Date	Notification Date
System: Billing System Implementations, RN, Final, 12/3/01	11/15/2001	12/3/2001

EXCEPTION 3110

Qwest OSS Evaluation

Email Headline	Implementation Date	Notification Date
System: EMI Fields Fixed on DUF, RN, 12/6/01	11/29/2001	12/6/2001
System: Billing System Implementation 12-7-01, Final	11/29/2001	12/7/2001
System: Delayed Bill Post Notifications, 12/14/01	12/4/2001	12/14/2001

4. Inadequate interval for planned outage notices

KPMG Consulting identified eight notifications that were sent to CLECs about planned system outages. All were distributed within fewer than three business days in advance of the outage.³ In one instance, Qwest notified CLECs on December 7, 2001, at 5:41 PM, about a planned outage scheduled to start at 5:00AM on December 8, 2001. (Appendix B).

Email Headline	Planned Outage (Mountain Time)	Notification Date (Mountain Time)
System: OSS Scheduled Mtc., Final 12/4/01	12/7/2001 8:00 PM	12/5/2001 2:27 PM
System: OSS Scheduled Maintenance, N, Final, 12/5/01	12/9/2001 12:00 PM	12/5/2001 5:46 PM
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/9/2001 12:00 PM	12/6/2001 12:59 PM
System: DLIS Availability, 12/7/01	12/8/2001 5:00 AM	12/7/2001 5:41 PM
System: OSS Scheduled Maintenance, 12/10/01	12/12/2001 10:00 PM	12/11/2001 5:17 PM
System: OSS Scheduled Maintenance 12-13, 12/11/01	12/13/2001 10:00 PM	12/11/2001 5:30 PM
System: OSS Sched. Mtce. CEMR-MEDIACC 12/14-12/16	12/14/2001 10:00 PM	12/12/2001 6:16 PM
System: OSS Sched. Mtce. Weekend of 12/14, 12/12/01	12/13/2001 8:30 PM	12/12/2001 6:31 PM

5. Inadequate information

³ KPMG Consulting notes that Qwest has not formally defined the notification interval for planned system outages. See Action Item #209, p. 66 of the *CMP Redesign Draft Meeting Minutes Dec. 10-11*.

EXCEPTION 3110

Qwest OSS Evaluation

On December 27, 2001, Qwest distributed a notification informing CLECs of rate restructuring in Montana that was planned to take effect after the January 2002 billing date. Qwest advised CLECs to contact Qwest Billing Representatives for specific details after the changes were implemented, but did not specify an exact date for when the changes were to take effect (Appendix C).

6. *Lack of adequate tracking and verification*

In response to KPMG Consulting's data request and subsequent clarification, Qwest submitted copies of Mailout Notifications that it had distributed to CLECs, rather than an actual database or other logging tool used to track CLEC notifications⁴. KPMG Consulting infers from the data request responses that Qwest lacks a centralized database to track information that is distributed to CLECs.

Based on the above analysis, it appears that Qwest does not distribute accurate information on a timely basis. In addition, Qwest appears to lack the proper tools to track CLEC notifications and ensure that the information therein is accurate. KPMG Consulting considers the procedures, systems, and tools that Qwest uses to track information and monitor its compliance with documented intervals for notification to be an essential element of the Change Management process.

Impact

CLECs depend on accurate, dependable, and timely information to support their business and fulfill obligations of their customers. If a Mailout Notification includes an erroneous topic in its subject line, a CLEC may route the notification to the wrong department and responsible individual(s). If a Mailout Notification is distributed without an adequate interval in advance of the planned change, a CLEC might not have the flexibility to reschedule its workforce and to complete transactions in a timely manner. The issues identified in this Exception may result in CLEC operational inefficiencies, thereby reducing CLEC profitability and impacting the CLEC's ability to compete in the Local Exchange Carrier market.

Attachments: Appendices A, B, and C.

⁴ KPMG Consulting data request CM27: Database of Qwest notifications to CLECs. KPMG Consulting stated, in a subsequent clarification, dated December 12, 2001, that KPMG Consulting requested "the actual database tool or logging tool that Qwest uses to keep track of the notifications it has sent to CLECs."

EXCEPTION 3110
Qwest OSS Evaluation

Appendix A



December 27, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 10, 2001

Effective Date: December 10, 2001

Document Number: PROD.12.10.01.F.A000236

Notification Category: Product Notification

Target Audience: CLEC, Resellers

Subject: Residence Competitive Response Promotion - Utah

This is to advise you of a retail promotional offer. Qwest apologizes for the delay in notification.

Product name: Residence Competitive Response Promotion

EXCEPTION 3110

Qwest OSS Evaluation

Tariff/catalog/price list reference: No tariff

State(s): Utah

Effective date of retail offer: 12/10/01 through 3/9/02

Description:

The Residence Competitive Response Promotion will be offered during a promotional period from December 10, 2001 through March 9, 2002, to residence customers who have terminated or canceled all or part of their Company services and established service with another telecommunications provider, and such residence customers are reestablishing service with the Company.

Returning residence customers can receive a maximum of either a waiver of the current nonrecurring charge(s), or up to two months credit of the current monthly rate(s), or both, on selected services as determined by the Company.

Please notify only those resellers with approved resale agreements according to the terms specified in their resale agreement. Advise them that retail offers that are subject to Commission approval and may change. Reseller should monitor filings, since Qwest will not provide notification of changes.

If you have any questions or would like to discuss this notice please contact your Qwest Sales Executive, Sue Gwin on 3039653353. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell

EXCEPTION 3110
Qwest OSS Evaluation

Appendix B



December 7, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 7, 2001

Effective Date: December 7, 2001

Document Number: SYST.12.07.01.F.02463.DLIS_Availability

Notification Category: General Notification

Target Audience: CLECs, Resellers

Subject: Directory Listing Inquiry System Availability

This *Communicator* is to advise you that, as a result of scheduled maintenance of the Listing Service System (LSS), the Directory Listing Inquiry System (DLIS) will not be available on December 8, 2001 from 5:00 AM to 8:00 PM Mountain time. The functionality is expected to be restored by 5:00 AM, Mountain time, December 10, 2001.

EXCEPTION 3110

Qwest OSS Evaluation

Questions regarding this *Communicator* can be directed to Melissa Garcia at 303-965-6019.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell

EXCEPTION 3110

Qwest OSS Evaluation

Appendix C



December 27, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 27, 2001

Effective Date: December 28, 2001

Document Number: GENL.12.27.01.F.001516.Montana_Rate_Restructure

Notification Category: General Notification

Target Audience: CLEC, Reseller

Subject: Rate Restructuring for the State of Montana

In accordance with your Interconnection Agreement with Qwest Corporation (formerly doing business as U S WEST Communications, Inc), rates have been restructured pursuant to the Stipulation Agreement approved on October 12, 2001, by the Montana Public Service Commission in Docket Number D2000.6.89 by Order Number 6260b.

02/19/2002

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EXCEPTION 3110

Qwest OSS Evaluation

These rates will be reflected on or after your January bill date. Activity is in progress to apply billing adjustments based upon true-up requirements ordered by the Montana Public Service Commission as well as true-up requirements defined in your Interconnection Agreement.

Once the rates have been implemented and the adjustments have been applied, please contact your Qwest Billing Representative for specific details or if you have any questions.

If you would like a copy of your rate sheet, please contact your Service Manager.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops, and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process.

Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

cc: Sue Gwin

Pam O'Connell

Test Vendor ID: EXP 3111
Qwest Internal Tracking ID: TI 828
Observation/Exception Title: Change Management Process
Test Type/Domain: Test 23 - Change Management
Date Qwest Received: 01/30/2002
Initial Response Date: 02/12/2002

Test Incident Summary:

Exception 3111 was initially released as Observation 3067 on December 12, 2001. KPMG Consulting recommended on January 30, 2002 that Observation 3067 be closed and moved to Exception 3111.

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package.

Background:

The Qwest Systems Change Management Process (CMP) is the method used by both Qwest and CLECs to implement changes to Qwest wholesale OSS interfaces. This process includes initiation, clarification/evaluation, presentation, prioritization, implementation, and completion of all systems change requests (CRs). CLECs participate in the CR Prioritization Process to vote on both Qwest- and CLEC-initiated CRs.¹ The outcome of this CR Prioritization Process determines if CRs deemed critical to CLEC business operations, according to CLEC voting results, will be included in an upcoming OSS release.

Issue:

Qwest Systems CMP lacks documented guidelines for prioritizing and implementing CLEC-initiated systems CRs. KPMG Consulting reviewed existing Qwest documentation, including the *Co-Provider Industry Change Management Process (CICMP) Document* and the *CICMP – CR Prioritization Process Document*², and noted the following:

- Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;

¹ In the context of CMP Redesign, Qwest and CLECs have not yet agreed on whether or not regulatory and industry guideline CRs are subject to the CR Prioritization Process.

² The *CICMP Document* and *CICMP – CR Prioritization Process Document*, located at www.qwest.com/wholesale/cmp/whatiscmp.html, represent the most recent Qwest documents relevant to the CR Prioritization Process prior to the initiation of CMP Redesign.

- Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs;
- Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs; and
- Qwest documents lacked information on how Qwest identified CR package options for a software release that it recommended to CLECs, following the CR Prioritization Process.

Impact:

In the absence of guidelines for the system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Qwest Formal Response to O3067 (12/20/01):

Qwest responses to the 5 KPMG stated issues.

1. *"Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."*

Once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. *"Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."*

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. *"Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."*

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.
- The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted.
- Business and systems requirements are developed for more CRs than can ultimately be included in the release.

4. "Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs."

The Co-Provider Industry Change Management Process document does not have specific definitions for Level of Effort. However, in the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01* the following language has been agreed to in the *CLEC-Qwest OSS Interface Change Request Initiation Process* section:

"Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.

- Small – requires changes to only one subsystem of a single system
- Medium – requires changes to 2 or more subsystems of a single system
- Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
- Extra Large – requires extensive redesign of at least one system."

Additionally, Qwest and the CLECs are currently negotiating a refined preliminary Level of Effort criteria based on a rough estimate of the number of people-hours necessary to complete a CR.

5. *Qwest documents lacked information on how Qwest identified CR package options "for a software release that it recommended to CLECs, following the CR Prioritization Process."*

The CLEC-Qwest OSS Interface Change Request Initiation Process section of the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01* provides the following language which has been agreed to by the CLECs and Qwest:

"At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."

KPMG Consulting's First Response to O3067 (01/04/2002):

KPMG Consulting reviewed Qwest's responses, and identified the following issues:

1. KPMG Consulting reviewed the *Master Redline CLEC-Qwest CMP Re-Design Framework* document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analyses of CLEC-initiated systems CRs.
2. KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.
3. KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest's software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about *all CRs* during the prioritization process.
4. Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications

would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependences, as well as tradeoffs, among numerous CRs, during the prioritization process.

5. KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.

Qwest Response to KPMG Comments to O3067 (01/14/02):

The following response addresses the five issues identified by KPMG in their response dated January 4th, 2002. KPMG's issues have been replicated below in *Italics* for ease of reading.

1. *KPMG Consulting reviewed the Master Redline CLEC-Qwest CMP Re-Design Framework document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analysis of CLEC-initiated systems CRs.*

There has been no definitive discussion in CMP Redesign sessions to include a detailed description of the roles and responsibilities of Qwest staff who do not interface directly with CLECs on CMP functions, including those who conduct detailed business and system analyses of CLEC-initiated systems CRs. However, once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft will further describe the process, roles and responsibilities of Qwest personnel who participate in the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

As stated in Qwest's initial response, this text is not included in the *Master Redline* document because it has yet to be reviewed and approved by the CMP Redesign team. A draft of the text is contained in the document *Qwest Proposed Managing the CMP Language - Revised 11-20-01* which is located in the *Redesign Documentation* section of the Qwest CMP Redesign Web site.
(<http://www.qwest.com/wholesale/downloads/2001/011121/PrpManagingCMPLang.doc>).

2. *KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.*

Qwest will continue to publish completed and accepted Redesign documentation in the form of the most recent update of the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft. This document is available on the Qwest CMP Redesign Web site, <http://www.qwest.com/wholesale/cmp/redesign.html>. Additionally, Qwest distributes an email message containing all Redesign documentation, agreed-to and proposed, before and after each Redesign session. KPMG representatives are included in these distributions. The next meeting of the CMP Redesign team is scheduled for January 22nd through 24th, 2002. The findings should be documented by January 28th, 2001. If that timetable is met, KPMG will receive the revised documentation no later than January 29th, 2002.

3. *KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest's software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about all CRs during the prioritization process.*

As discussed, agreed-to, and documented in Section 3.0 of the *Master Redline*, an initial "rough estimate" of the level of effort (LOE) for each CR is determined as an aid in CLEC prioritization. Due

to resource constraints, Qwest is unable to commit to conduct a detailed assessment of the level of effort (LOE) for every release candidate.

4. *Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependencies, as well as tradeoffs, among numerous CRs, during the prioritization process.*

After discussion during several recent Redesign meetings Qwest and the CLECs agreed to no longer utilize "T-shirt" sizing to categorize the level of effort for a release candidate. At Redesign meetings Qwest has agreed to provide CLEC's with actual level of effort range estimates in order for CLEC's to prioritize which CRs can be included in a major release. Qwest is currently developing these range estimates, and will present them to the CLECs at the January 2002 Redesign session. These estimated ranges are not intended to give the CLECs a view of the overall capacity of the release.

Qwest and the CLECs have agreed to a process documented in Section 3.0 of the *Master Redline* that will provide the CLECs with meaningful information with which to make informed decisions regarding the prioritization of CRs. That process is currently written as follows but will be updated to remove the T-shirt sizing when the ranges have been agreed upon.

"Qwest will review the CRs received prior to the cut off date and evaluate whether Qwest can implement them. Qwest's responses will be one of the following:

- "Accepted" (Qwest will implement the CLEC request) with position stated. If the CR is accepted, Qwest will provide the following in its response:
 - Determination and presentation of options of how the CR can be implemented
 - Identification of the preliminary level of effort (S, M, L, and XL) required to implement the CR. **(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)**
 - Small – requires changes to only one subsystem of a single system
 - Medium – requires changes to 2 or more subsystems of a single system
 - Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
 - Extra Large – requires extensive redesign of at least one system.

If CLECs do not accept Qwest's response, they may elect to escalate or dispute the CR in accordance with the agreed upon CMP escalation or dispute resolution procedures. If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP Manager. If the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be status deferred and CLECs may activate or close the CR at a later date.

At the monthly CMP meeting, the CR originator will provide an overview of its respective CR(s) and Qwest will present either a status or its response.

Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest, resulting in the initial release candidate list. CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface are not subject to

prioritization and will follow the introduction or retirement processes outlined in Sections x and x of the *Master Redline*, respectively.

Based on the initial release candidate list, Qwest will begin its development cycle, which includes the following milestones:

- Business and systems requirements: Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order.
- (AT&T Comment) *Packaging: Qwest and CLECs will discuss grouping candidates with affinities may be addressed more efficiently if taken together.[AT&T comment: this may not be exactly the right description. We just wanted to add this to this list of steps.]*
- Design: Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on a per candidate basis in priority order.
- Code & Test: Qwest engineers will perform the coding and testing required to complete the work associated with each candidate. The code and test work is completed on a per candidate basis in priority order.

Using the initial release candidate list, Qwest will begin business and system requirements. During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the release candidate list (late added CRs). (**WCOM COMMENTS: CHANGE "INITIAL RELEASE CANDIDATE LIST TO "RELEASE CANDIDATE LIST."**) If the CMP body grants the request to consider the late added CRs for addition to the release candidate list, Qwest will size the CR's requirements work effort. If the requirements work effort, for the late added CRs, can be completed by the end of system requirements, the initial release candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Prioritization Process (see Section xx of the *Master Redline*). If the requirements work effort, for the late added CRs, cannot be completed by the end of system requirements, the CR will not be eligible for the release and will be returned to the pool of CRs that are available for prioritization in the next OSS interface release.

At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."

This process, agreed-to by Qwest and the CLECs, provides a Level of Effort to the CLECs to use during Prioritization and outlines to process for Qwest to present various packaging options to the CLECs.

5. *KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.*

The assessment and identification of candidate affinities is not a structured process. Qwest relies on the knowledge and experience of its system architects and analysts to identify opportunities for efficiency in all areas of system development including those related to candidate affinity. A few of the factors considered in assessing affinities include modifications to common modules or data components, changes to common transactions, and use of common resources.

KPMG Consulting's Initial Release of Exception 3111 (01/30/2002):

KPMG Consulting responses for each issue raised in Observation 3067 are detailed below. For ease of reference, KPMG Consulting has assigned numbers for each issue.

- 1) *Qwest internal and external documents lack the roles and responsibilities of Qwest software development staff who are involved in the analysis of CLEC-initiated systems CRs;*

In its response to Observation 3067, Qwest affirmed that text regarding the roles and responsibilities of staff who conduct business and system analyses of CLEC-initiated systems CRs is not included in *Master Redline CLEC-Qwest CMP Redesign Framework Interim Draft*, since it has not yet been reviewed and approved by the CMP Redesign team. Qwest indicated that draft language was contained in another document, *Qwest Proposed Managing the CMP Language – Revised 11-20-01*. KPMG Consulting reviewed this document, and was unable to identify information therein that describes the responsibilities of Qwest staff who perform the preliminary evaluation, analyses, or subsequent packaging of CLEC-initiated CRs. Because the draft language has not yet been finalized or agreed upon as part of CMP Redesign, and is not included in any formal Qwest document, KPMG Consulting considers these roles and responsibilities to be undefined. As previously mentioned in its January 4, 2002 response to Observation 3067, KPMG Consulting continues to monitor the CMP Redesign process relative to the assignment of staff and managers.

KPMG Consulting deems the existence of defined roles and responsibilities for groups such as the IT staff, internal boards, external vendors, and Wholesale Change Management representatives to be indicative of whether or not a fully functional process is in place. KPMG Consulting recognizes that, prior to the CMP Redesign, Qwest operated a former process, referred to as the Co-Provider Industry Change Management Process (CICMP), and that, therein, established procedures for considering the CLEC-assigned priority of a change request in relation to such factors as available resources and Qwest-initiated priorities may have existed. KPMG Consulting would expect Qwest to be able to provide some information independent of CMP Redesign status that explains the functions of personnel who are responsible for evaluating CLEC-initiated CRs, as well as any guidelines used to carry out work assignments. This issue is unresolved.

- 2) *Qwest does not provide CLECs with information on the manner in which Qwest allocates available resources (capacity) for systems CRs to be included in an OSS release;*

Qwest's January 14, 2002 response stated that resolution of how Qwest allocates its available resources for systems CRs to be included in releases is still pending Qwest-CLEC negotiation of CMP Redesign. Under the terms of the CMP Redesign process, Qwest will continue to publish the completed and accepted Redesign documentation at the Qwest Redesign Web site. Qwest and CLECs held a series of meetings on January 22 through 24, 2002.

KPMG Consulting reviewed all information pertaining to resource allocation issues that was discussed at the most recent collaborative sessions. KPMG Consulting's understanding is that the documentation from those sessions remains incomplete and in draft state, and that Qwest plans to provide the *revised* documentation by January 29, 2002. KPMG Consulting is prepared to consider and review all *final* documentation that accurately describes the formalized, implemented process (i.e., documentation that reflects the most current representation of Change Management for this subtopic/area).

The lack of capacity resource information for conducting a fundamental task, i.e., implementation of changes requested by wholesale customers, is reflective of the larger issue, confirmed by Qwest, that no criteria defined for Qwest's developing the scope of an OSS Interface Release Package exist. Thus, when CLECs assign a priority for CRs, and collectively decide which they consider important, there is very little



information available about how Qwest factors the results of CLEC prioritization into its program development and project planning activities. This issue remains unresolved.

- 3) *Qwest software development teams do not perform detailed business and system analyses on CLEC-initiated CRs;*

In response to this issue, Qwest reiterated that it cannot include all CLEC-initiated CRs in a given, upcoming release, and that a detailed assessment of all CLEC-initiated CRs is infeasible due to resource constraints. Qwest also stated that it begins at the top of the prioritization list and continues down until all development resources are exhausted. Systems requirements are developed for more CRs than can ultimately be included in the release. Yet, it is unclear as to if, or how, Qwest considers relative costs and benefits, whether or not there is any pairing or interaction between system CRs filed for the same release (i.e., affinities), and if any of the same CMP development resources are dedicated to correct defects and conduct maintenance of Qwest production systems. In a discussion about meeting topics, one CLEC noted that, during the January 2002 prioritization exercise, some lower priority items were "packaged" (i.e., scheduled for inclusion in a release), whereas some higher priority requests were excluded or delayed.³

KPMG Consulting considers the fact that Qwest software development teams do not perform structured business and systems analysis of CLEC-initiated CRs as another indicator that no defined criteria are used to determine the overall scope of release capacity, and no systematic, consistent, and repeatable process is used to implement both CLEC and Qwest-initiated change requests. This issue, which remains unresolved, is related to the level of effort (LOE) estimate, which Qwest stated was already agreed-to as an aid to CLEC prioritization.

- 4) *Qwest documents lack definitions and criteria for establishing the Level of Effort (LOE, formerly known as "T-shirt size") assignment for individual CRs; and*

In response to this issue, Qwest indicated that it plans to revise the LOE parameters to provide CLECs with an actual level of effort range. It also stated that these ranges would not be intended to provide CLECs with a view of the overall capacity of the release. Qwest outlined the agreed-upon packaging process that is included in the *Master Redline* document. Although the Redesign efforts have resulted in progress for this area, and some language has been completed, incorporation of LOE ranges remains unresolved until CLECs and Qwest can agree upon the appropriate level of detail for CR sizing definitions. Participants in the CMP Redesign meetings held January 22 through 24, 2002, did not discuss or resolve pending Action Items, including #146 *Criteria used to determine LOE for a release*. In its previous response, Qwest stated that it is unable to commit to conducting a detailed assessment of the LOE for every release candidate. KPMG Consulting requests that Qwest provide information about which release candidates will receive detailed business and system analyses, and how this decision will be made. This issue is unresolved.

- 5) *Qwest documents lack information on the manner in which Qwest identifies CR package options for a discrete software release that it recommends to CLECs, following the CR Prioritization Process.*

In response to this issue, Qwest stated that, "the assessment and identification of candidate affinities *is not a structured process*" [italics added]. This served as a further indication that criteria, such as those that Qwest would use to identify package options, do not exist, are not formally defined, and are not documented, either internally or within the context of CMP Redesign. This issue is unresolved.

³ See CMP Redesign email sent by Qwest to Eschelon Telecom, Inc. on January 22, 2002, Subject: *Redesign issues discussed in January CMP meetings*, Item Number 4.

Observation 3067 has been escalated to Exception 3111 for three reasons:

- KPMG Consulting considers the five sub-issues above unresolved; some issues appear to be at impasse.
- Qwest stated that elements described in the original Observation will not be finalized (and thus cannot be implemented) until CMP Redesign is complete.
- Based on Qwest's latest response and the current state of CMP Redesign implementation, at least one KPMG Consulting evaluation criterion for Test 23 would be assigned a "Not Satisfied" result.

To summarize, criteria for use by Qwest's software development teams to develop the priorities, capacity, and capabilities of a software release are neither documented nor fully defined. The lack of established and documented development criteria, and a clear process for Qwest resource allocation for wholesale OSS, may result in the Qwest software development teams' overlooking and/or ignoring CRs deemed important to CLECs, as determined by the results of the prioritization process. Failure on the part of Qwest to attend to CRs that CLECs deem critical to their business operations in a timely manner may result in lengthy delays in implementing these changes. This may prevent CLECs from receiving important order and pre-order functionality, thus inhibiting their ability to compete in the local exchange carrier market.

Qwest Formal Response to Exception 3111 (02/12/2002):

Listed below are Qwest's responses to each of the "sub-issues" identified in KPMG's previous response. The numbers correspond to those used by KPMG.

1. Qwest will provide, via the data request process, documentation of the internal methods and procedures that define the roles and responsibilities for Qwest personnel involved in prioritization of CLEC initiated system change requests. The documentation will be made available by February 22nd, 2002.
2. The Master Redline document, Section 9.2 states: *"At the last Systems CMP meeting before Prioritization, Qwest will facilitate the presentation of all CRs eligible for Prioritization. At this meeting Qwest will provide a high level estimate of the Level of Effort of each CR and the estimated total capacity of the release. This estimate will be a rough estimate of the number of person hours required to incorporate the CR into the release."*

Qwest has subsequently added similar language in the CR Initiation section to state that LOEs will be provided: 1) Prior to prioritization 2) At packaging and 3) At commitment. The submitted text will be reviewed with the CLECs during the next CMP Redesign session scheduled for February 19th, 2002. Qwest will provide an update regarding the progress of this issue in a supplemental response to this exception by February 22, 2002. IMA 11.0 and SATE 11.0 will be the first releases for which Qwest will provide release capacity estimates for use in the CR prioritization process.

3. As stated above in the response to sub-issue 2, Qwest agreed to provide the capacity constraints of major releases for use in prioritization of CRs. Qwest also provides a high level estimate of the LOE for all CR candidates for use CR prioritization. After prioritization, Qwest conducts a detailed evaluation of each CR candidate beginning with the highest priority CR and ending when the capacity of the release is exhausted. All of these activities are identical whether Qwest or a member of the CLEC community initiated the CR.

The CMP redesign sessions conducted February 5-7 2002 concluded without a resolution to CR prioritization. The topic will be re-addressed at the next CMP Redesign session scheduled for February 19th, 2002. Qwest will provide an update regarding the progress of this issue in a



ROC Observation & Exception Formal Response

supplemental response to this exception by February 22, 2002. When the prioritization process is agreed upon this sub-issue will be completely addressed.

4. As stated in the prior response and reiterated in the response to sub-issue 3 above, Qwest provides a high level estimate of the LOE required for each CR candidate. The high level estimate is for use in candidate prioritization. After the release candidates are prioritized, using the process agreed to in the CMP redesign, Qwest conducts a detailed assessment of the LOE for each candidate beginning with the highest priority candidate and concluding when the estimated capacity for the release is exhausted.

Qwest and the CLECs have achieved significant progress toward defining the LOE estimation process for change requests. These refinements are reflected in the most recent version of the Master Redlined Document posted on Qwest's web site repository for CMP documents.

5. Qwest will provide, via the data request process, documentation of the internal methods and procedures followed by Qwest to identify packaging efficiencies for system changes. The documentation will be made available by February 22nd, 2002.

Attachment(s): None



Test Vendor ID: EXP 3112
Qwest Internal Tracking ID: TI 829
Observation/Exception Title: OSS Interfaces
Test Type/Domain: Test 24 - Interface Dvlpmnt & Relationship Mgt
Date Qwest Received: 01/30/2002
Initial Response Date: 02/13/2002

Test Incident Summary:

An exception has been identified as a result of test activities associated with the Change Management Review, MTP Test 23, and Wholesale Systems Help Desk (WSHD), MTP Test 24.7.

Exception:

Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces.

Background:

Production support changes address defects in the production version(s) of an OSS interface. Such defects may include interrupted connectivity, failed transactions, system crashes, degraded performance, data corruption, memory leaks, and/or functionality not coded to specification.

The purpose of a production support process is to quickly and effectively restore critical production components by repairing defects or implementing temporary work-around processes. This process would also include the implementation of a tactical plan to complete restoration of normal production capabilities. For critical situations, the standard software release intervals associated with the established Change Management Process (CMP) are considered too long to implement corrective changes.

KPMG Consulting would expect a comprehensive and fully documented production support process to include the following sub-procedures and essential elements:

- A. Identification and verification procedures;
- B. Evaluation, categorization, and prioritization procedures;
- C. Internal and external communication procedures;
- D. Status tracking and reporting procedures;
- E. Escalation procedures;
- F. Restoration and closure procedures;
- G. Testing procedures, including support for defects observed in test environments;
- H. Documentation management procedures; and
- I. Training procedures.

Issue:

KPMG Consulting has observed that Qwest does not have a documented production support process in place to resolve time-sensitive production support issues and changes. KPMG Consulting formally identified this issue in Observation 3052. In response, Qwest provided KPMG Consulting with documents

that specify OSS contingency plans. KPMG Consulting reviewed Qwest documentation, and determined that Qwest does not have a distinct, consolidated process document to address the issue in question.¹

Impact:

In the absence of a comprehensive and fully documented production support process, CLECs do not have assurance that failures in the production version(s) of OSS interfaces can be corrected efficiently and effectively. The absence of these defined corrective measures can lead to downtime, miscommunication about the status of an interface system outage or issue, and delays in critical systems resolutions, which can negatively impact CLECs' business operations.

Appendix A

Production Support Matrix

KPMG Consulting reviewed the following Change Management Process documents for the existence of the nine criteria that are outlined in the Background section of this Exception:

- *Co-provider Industry Change Management Process (CICMP) document;*²
- *IMA Change Management Document;*³
- *Master Redlined CMP Redesign Production Support Language – 12/11/2001;*⁴ and
- *Master Red-lined CLEC-Qwest CMP Re-Design Framework – Interim Draft dated 12/10/2001.*⁵

Production Support Matrix

Reference Criteria	Production Support Sub-Process	Effective CICMP ⁶	Proposed Redline CMP ⁷
A	Identification and verification procedures	Not documented/missing	Not documented/missing
B	Evaluation, categorization, and prioritization procedures	Prioritization document not finalized; CLECs and Qwest still determining how prioritization of low severity, Type I category changes are to be prioritized.	TI676-A section I.4 provides cursory review of prioritization process
C	Internal and external communication procedures	Executive summary, section I.III, II.I, and III cover communication without specific details about Production Support. No reference made to Production Support types	TI676-A sections I.5 and I.6 provide cursory review of communication requirements.

¹ In its response dated 12/28/2001, Qwest stated that "each Qwest back-end system will follow its own process for problem resolution and prioritization of fixes and communicate status back to the Help Desk." KPMG Consulting interprets this to mean that Qwest lacks a single, operational system to address production support issues.

² The *CICMP Document* dated 5/11/2001 represents the CMP document in place before the start of CMP Redesign. It is located at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

³ The *IMA CMP Document* dated 11/01/01 and defines the process through which Qwest prioritizes and processes Change Requests for IMA software releases.

⁴ The redline document is located at <http://www.qwest.com/wholesale/cmp/redesign.html>

⁵ The redline document is located at <http://www.qwest.com/wholesale/cmp/redesign.html>

⁶ Effective documentation such as CICMP (05/14/01), Escalation (12/01/00), Qwest RN Enhancements (12/06/00), and Industry Team CR Prioritization (12/01/00) are available at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

⁷ Proposed redline documents change frequently. The current draft documentation is available at <http://www.qwest.com/wholesale/cmp/redesign.html>

		of changes.	
D	Status tracking and reporting procedures	Section III.VIII.6 covers CR and RN databases, not Trouble Tickets or Production Support	TI676-A section I.3 provides cursory review of reporting processes
E	Escalation procedures	Escalation document covers CRs but not Production Support	Not documented/missing
F	Restoration and closure procedures	Not documented/missing	Not documented/missing
G	Testing procedures, including test environments	Not documented/missing	TI676-B section "Joint Testing Period" provides cursory review of the testing process
H	Documentation management procedures	CICMP document executive summary, section III, and section III.II.5 define a number of document requirements. However, no specifics are provided.	Not documented/missing
I	Training procedures	Not documented/missing	Not documented/missing

Qwest Formal Response:

In the 01/24/02 response to EXP 3102, Qwest committed to provide an integration document to KPMG by February 7, 2002. This document has been provided to KPMG via the usual data request process. The Integration Document addresses criteria A and criteria C – G outlined by KPMG in the "Background" section of this exception.

Criteria B refers to evaluation, categorization, and prioritization procedures. The Wholesale CMP prioritization document has not been finalized, pending the completion of CMP Redesign. This portion of the redesign effort is anticipated to be completed by February 19, 2002. Qwest will provide an update on the status of this item by February 22, 2002.

Qwest is in the process of making revisions to the Integration Document that address documentation management procedures and training procedures identified in criteria H & I above. Qwest will provide an updated version of the Integration Document by February 22, 2002 that will address criteria H and I.

Attachment(s): None

EXHIBIT G

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

Qwest Change Management Process Issues

Note: The Qwest Change Management Process (CMP) is undergoing redesign through discussions with CLECs. This commenced in July 2001 and continues. Meetings are scheduled through April 2002 and may continue past that date. Many of the issues described below are part of the redesign discussions.

There are four major issues that have been raised through the Arizona and ROC 3rd Party OSS Tests:

- a) The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
- b) Qwest fails to adhere to the practices and procedures documented in its CMP
- c) CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed
- d) The CMP does not address issues reasonably defined as CMP issues

These issues are grouped in the tables below (to keep this relatively brief, in several cases the statements of the Testing Issue or Qwest Response were summarized. For their full statements, please refer to the IWO, Exception or Observation identified):

IWO -- Incident Work Orders identified in the Arizona test

E -- Exceptions identified in the ROC test

O -- Observations identified in the ROC test

- A.** The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.

IWO1076

IWO1078

- B.** Qwest fails to adhere to the practices and procedures documented in its CMP

Exception 2003 Exception 3110

Exception 3094 Observation 3066

- C.** CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

Exception 3093

Exception 3102

Exception 3111 (previously tracked as Observation3067)

- D.** The CMP does not address issues reasonably defined as CMP issues

IWO 1075

Exception 3112

Observation 3052

IWO1076	<p>a). The CMP is deficient</p> <p>The CMP is inefficient as too much time elapses between initiation and implementation of CLEC Change Requests</p> <p>IWO HAS BEEN SUBMITTED FOR ACC RESOLUTION UNDER THE IMPASSE PROCESS</p>	<p>Testing Issue:</p> <p>The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.</p> <p>Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.</p>	<p>Qwest Response</p> <p>10/25/01 - The Change Request (CR) Processes used in the Change Management Process (CMP) have been reviewed, re-designed, and implemented.</p> <p>Qwest implemented the following measures to improve the timeliness and accuracy of the CR Process:</p> <p>Project Managers were added to Qwest's CMP Staff to ensure the timely resolution of CRs and action items.</p> <p>Qwest Subject Matter Experts (SMEs) now conduct a Clarification Meeting with the CLEC originator of a CR prior to the first CMP Monthly Meeting following receipt of a CR.</p> <p>*****</p> <p>A database was developed to track CR status.</p> <p>A report that captures all of this information is provided on the web for the CLECs.</p>	<p>AT&T Comments</p> <p>AT&T remains concerned about the overall time it takes for CRs to go through the process to implementation. CLECs requested that Qwest provide and overall timeline to discuss this issue. That discussion has not taken place yet.</p> <p>CMP Redesign is far from complete. The parties have a twenty page open issues list and meetings currently scheduled through April 2002 for redesign.</p> <p>Qwest states that the Interim Qwest Product and Process Change Request Initiation Process was agreed to and that Qwest implemented this process by November 15, 2001. Qwest has <i>not</i> implemented this process as agreed to with CLECs. CLECs continue to wait for Qwest to full and properly implement this process.</p> <p>Improving the timely flow of Change Requests from initiation to implementation is critical.</p>
IWO1078	<p>CLECs do not receive Qwest specifications in time to conduct analysis, perform programming, conduct testing, and implement system changes. The CMP needs to provide orderly flow of information for timely implementation.</p> <p>IWO HAS BEEN SUBMITTED FOR ACC RESOLUTION UNDER THE IMPASSE PROCESS</p>			

a). The CMP is deficient		
Testing Issue:	Qwest Response	AT&T Comments
<p>"Final" EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors.</p> <p>The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest's. The lack of a true "requirements freeze" a sufficient time prior to production release, coupled with the lack of a true EDI testing environment, make it difficult for CLECs to successfully code their systems and do true user acceptance testing.</p>	<p>10/25/01 - As part of the Change Management Process (CMP) re-design, Qwest has proposed to implement the following schedule effective with the IMA 10.0 Release. This schedule meets or exceeds the national industry standards as prescribed in OBF Issue 2233.</p> <p>Qwest will provide a 12-month view of its OSS Interface Development Schedule.</p> <p>Qwest will provide draft technical specifications at least 73 calendar days prior to implementing the release unless the Exception Process has been invoked</p> <p>Technical specifications are documents that provide information the CLECs need to code the interface.</p> <p>CLECs have 15 calendar days from the initial publication of the draft technical specifications to provide written comments/questions regarding the documentation.</p> <p>Qwest will sponsor a walkthrough for the CLECs beginning 68 calendar days prior to implementation.</p>	<p>While CLECs and Qwest have agreed to language for the process to make changes to interfaces, we have not seen this process implemented. IMA 10.0 will not go into production until June 2002. As a result, we are still six months out and there are steps in this process that need to be completed to insure that Qwest implements it as agreed and meets the expectations of the parties.</p> <p>For example, one problem has been the time by which Qwest provides CLECs with sufficient information (specifications, EDI mapping, etc.) to enable CLECs to code. Qwest has agreed to provide such draft information 73 days in advance of the production date and final technical specifications 45 days in advance of the production date. Until Qwest actually goes through these steps, we cannot be certain about what Qwest will provide and whether it actually addresses the concerns previously raised.</p>

b). Qwest fails to adhere to the practices and procedures documented in its CMP			
E 2003	Release notification procedures are not followed; complete and accurate notifications are required		
	Testing Issue:	Qwest Response	AT&T Comments
	Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.	June 28, 2001 – Qwest proposes to address this issue in the redesign of CMP and outlines its proposal to change its CMP to meet evolving industry directions. 12/21/01 Qwest points to the CMP Redesign (document and ongoing negotiations) to respond to HP questions about: (i) the impact that changes to published target release dates have on CLECs' ability to plan for a new release on a shortened timeframe; (ii) requirements for re-certification notice to co-providers that re-certification and migration plans need to be developed, including timeframe and content; (iii) issues with regard to the multiple releases of disclosure document addenda and release notification release; (iv) deficiencies in Qwest's release change management process related to Qwest's release of addenda to its documentation.	Topics relating to this issue have been discussed in CMP redesign between Qwest and CLECs. More have yet to be discussed. However, the core of this issue is about Qwest performing in a manner that is inconsistent with the written process it has agree to follow. The redesign of CMP will not resolve this problem. By this exception, it is clear that Qwest has not followed the process it had in place prior to CMP Redesign. The only way to know if Qwest adheres to the redesign process is to continue to have the kind of review HP and KPMG have been conducting to observe Qwest's implementation of the redesigned process.
	5/14/01 – The P-CLEC outlined many problems it had with the release of IMA 6.0. 12/21/01 – HP (the P-CLEC) recommends keeping the exception open pending the successful implementation of the changed CICMP process.		
	During the January 22-24 CMP Redesign Meetings, Qwest proposed changes to address the certification and re-certification issues (ii above). The release of disclosure document addenda (iii above) was discussed in the February 5-7 Redesign Meetings. Re-testing will be required (i through iv, above) once the negotiated agreements are put in place.		
E 3094	Qwest did not provide notification about a proposed change; failed to provide adequate opportunity for CLEC input; ignored CLEC input; and did not update CR documentation.		
	Testing Issue:	Qwest Response	AT&T Comments
	Qwest did not adhere to its established change management process for notifying CLECs	12/21/01 - This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed	This Exception demonstrates that there has been confusion in the implementation of some of the changes resulting from the

b). Qwest fails to adhere to the practices and procedures documented in its CMP	
<p>about a proposed change, and allowing input from all interested parties.</p> <p>Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.</p>	<p>changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the <i>Interim Qwest Initiated Product/Process Change Request Initiation Process</i> that was developed in the CMP Redesign Sessions.</p> <p>At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs <i>only</i> for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop.</p> <p>Qwest then responded to each of the points raised by KPMG. By way of summary, these responses state that Qwest submitted a CR in good faith, that it conducted several meetings with CLECs, that the CR is being escalated by CLECs, that Qwest updates its CMP database statuses on an "every third day basis" and that the CR did not include a rate change.</p> <p>CMP Redesign. If it is difficult for Qwest to know which process applies to a given situation, imagine how difficult it is with multiple CLECs trying to use the process. By stating that the interim process does not apply, Qwest concedes that it is applying the old process. This points to the problems that arise with CMP moving from an existing process to a redesigned process.</p> <p>This exception illustrates a serious problem that currently exists in CMP.</p> <ul style="list-style-type: none"> • When Qwest initiates a CR, it goes through to implementation over the objections of CLECs. • CLECs' only recourse is escalation or dispute resolution. • However, if a CLEC initiates a CR, it will not get implemented unless Qwest agrees. <p>If Qwest does not agree, CLECs need to escalate or pursue dispute resolution. CLEC CRs do not have the same opportunity to succeed through CMP as Qwest CRs. CLECs should have an equal right to deny/reject Qwest CRs and let Qwest go through the dispute resolution process (since escalation is all within Qwest, one would expect escalation to yield the result Qwest wants).</p> <p>The CR that is the subject of this exception is being escalated by certain CLECs.</p>

	<p>b). Qwest fails to adhere to the practices and procedures documented in its CMP</p>						
E3110	<p>In its February 12 review of Qwest's positions on the issues identified in this Exception, KPMG concluded that the issues are not resolved and the Exception remains open. "KPMG Consulting reviewed aforementioned documents and identified that Qwest did not adhere to the expectations of a well-formed, functioning Qwest-CLEC change management process." Additional work will be required by Qwest before KPMG will examine the progress Qwest has made.</p> <p>Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.</p>						
	<table border="1"> <thead> <tr> <th data-bbox="480 1417 513 1829">Testing Issue:</th> <th data-bbox="480 653 513 1417">Qwest Response</th> <th data-bbox="480 121 513 653">AT&T Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="513 1417 1474 1829"> <p>Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:</p> <ol style="list-style-type: none"> 1. Delayed distribution 2. Erroneous topic 3. Late notice of system changes 4. Inadequate interval for planned outage notices 5. Inadequate information 6. Lack of adequate tracking and </td> <td data-bbox="513 653 1474 1417"> <p>Qwest's response is due 2/14/02 (not received.)</p> </td> <td data-bbox="513 121 1474 653"> <p>AT&T's experience in receiving timely and accurate notifications from Qwest regarding all manner of system events corresponds to those observed by KPMG.</p> <p>KPMG notes in the Exception the magnitude of the mailouts CLECs receive: "KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001." When these are issued with incorrect titles, are issued late or with such short notice that AT&T cannot make alternate plans for use of the systems and interfaces, the notifications are extremely disruptive.</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	AT&T Comments	<p>Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:</p> <ol style="list-style-type: none"> 1. Delayed distribution 2. Erroneous topic 3. Late notice of system changes 4. Inadequate interval for planned outage notices 5. Inadequate information 6. Lack of adequate tracking and 	<p>Qwest's response is due 2/14/02 (not received.)</p>	<p>AT&T's experience in receiving timely and accurate notifications from Qwest regarding all manner of system events corresponds to those observed by KPMG.</p> <p>KPMG notes in the Exception the magnitude of the mailouts CLECs receive: "KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001." When these are issued with incorrect titles, are issued late or with such short notice that AT&T cannot make alternate plans for use of the systems and interfaces, the notifications are extremely disruptive.</p>
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b). Qwest fails to adhere to the practices and procedures documented in its CMP							
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O 3066	Minor changes that do not impact CLEC operations can be made without notice through the CMP; all others must be implemented through CMP						
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<p>b). Qwest fails to adhere to the practices and procedures documented in its CMP</p>	<p>In its February 12 memo to KPMG on this Observation, Qwest addresses the three key points that remain issues for resolution regarding this Observation:</p> <ul style="list-style-type: none">• The amount of information that Qwest communicates to CLECs about point-release changes;• The notification intervals for point-release changes; and• The process by which Qwest systematically identifies all CLEC-impacting changes <p>KPMG will receive additional information from Qwest after February 22 that will provide additional information about the process Qwest uses to identify CLEC-impacting changes. This Observation remains open.</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed			
E 3093	Qwest's document management practices are not reliable		
	Testing Issue: Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent. The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices.	Qwest Response 12/19/01 - Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.	AT&T Comments This issue has been a source of concern raised by CLECs in the CMP redesign. As a result of these concerns, Qwest and CLECs developed a process called the interim Qwest Product and Process Change Request Initiation Process. To date, Qwest has not implemented that process as written. CLECs anxiously await implementation that is consistent with the agreed upon process. Qwest's response to this exception mentions Technical Publication and the PCAT (Qwest Product Catalog) only. This is not the full scope of documents identified by KPMG as being deficient with regard to document management. Qwest will need to insure that all its documents meet adequate document management standards.


	c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed		KPMG provide Qwest with seven (7) basic criteria that it uses to evaluate Qwest's documentation. Qwest expects to provide additional information to KPMG as to its conformance with these criteria by February 22.

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<table border="1"> <tr> <td data-bbox="250 138 656 657"> <p>definitions for CR types, categories, and database fields exist</p> <p>12/17/01 - KPMG still had concerns after receiving Qwest's 11/15/01 and 12/4/01 responses. The Qwest documentation still does not contain all necessary information. 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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed				
				If it actually ends at that time, such a methods and procedures document would not be ready before sometime in May, if Qwest could actually complete such a document in 30 days.
			Qwest has provided five (5) Supplemental Responses to KPMG to attempt to resolve the open issues raised in this Exception. The latest response (2/14/02) responds to two (2) issues; commits to providing additional documentation to KPMG for one issue by February 22.; addresses two (2) issues through data requests to KPMG; and advises that three (3) issues will be addressed later: "Issue Nos. 6(c), 6(d), and 6(e) following completion of the systems portion of the CMP Redesign."	
E 3111 (previously O 3067)			Qwest's internal processes do not provide for the CMP to be a part of its regularly performed systems development management process, including CR analysis, prioritization, resource allocation and packaging of CRs for implementation	
	Testing Issue:	Qwest Response	AT&T Comments	
	Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).	12/20/01 - Qwest responses to the 5 KPMG stated issues. 1. "Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs." Once approved by the Re-design Team, the <u>Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01</u> , located at http://www.qwest.com/wholesale/cmp/redesign.html , will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs. 2. "Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."	In the CMP Redesign, CLECs have sought information from Qwest on the process it uses to determine the resources required to complete a systems CR. CLECs have also sought to understand the other steps in the Qwest process, including "packaging" (where CRs with "affinities" are grouped together) and business and systems requirements. These discussions have been cut short and never completed. Understanding this is important to CLECs because Qwest tells us that there is a limited pool of resources to complete work on a systems release. This has meant that only some of the CRs get worked for a given release. The ones that are not worked in this process need to compete for resources again in the next release and may never get completed.	
	In the absence of guidelines for the system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays		Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business	

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.</p> <p>information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.</p> <p>3. "Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."</p> <p>Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:</p> <ul style="list-style-type: none"> • There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort. • The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted. • Business and systems requirements are developed for more CRs than can ultimately be included in the release. <p>4. "Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs."</p> <p>The Co-Provider Industry Change Management Process document does not have specific definitions for Level of Effort. However, in the</p> <p>the redesign discussion has addressed the "roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs." In fact there has been no discussion beyond identifying steps in the process. CLECs have sought to understand this, but the information has not been forthcoming from Qwest.</p> <p>(Item 4) While the language relating to sizing is in the redline document, as Qwest points out CLECs have requested further discussion and explanation of this step, to include the man hours necessary for the different levels of effort. This work still needs to be done.</p> <p>KPMG's observation with item 5 is accurate. The packaging step remains vague. Hopefully, the discussions referenced will bring light to this step and further modification to the master redline CMP document, if appropriate.</p>
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<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p><i>Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01</i> the following language has been agreed to in the <i>CLEC-Qwest OSS Interface Change Request Initiation Process</i> section:</p> <p>"Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.</p> <ul style="list-style-type: none"> • Small – requires changes to only one subsystem of a single system • Medium – requires changes to 2 or more subsystems of a single system • Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system • Extra Large – requires extensive redesign of at least one system." <p>5. <i>Qwest documents lacked information on how Qwest identified CR package options "for a software release that it recommended to CLECs, following the CR Prioritization Process."</i></p> <p>The <i>CLEC-Qwest OSS Interface Change Request Initiation Process</i> section of the <i>Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01</i> provides the following language which has been agreed to by the CLECs and Qwest:</p> <p>"At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed		between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."	
	In its February 12 response to KPMG's notice that Observation 3067 has been escalated to Exception 3111, Qwest commits to providing additional information on the steps it is taking to address the five (5) major points of concern. Qwest's timeline for responding to the issues is generally February 22.		

d). The CMP does not address issues reasonably defined as CMP issues			
IWO1075	CICMP is not collaborative; prioritization process excludes CLECs IWO HAS BEEN SUBMITTED FOR ACC RESOLUTION UNDER THE IMPASSE PROCESS		
	<p>Testing Issue:</p> <p>The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.</p> <p>The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.</p>	<p>Qwest Response</p> <p>10/25/01 - The re-designed Change Management Process (CMP) provides a collaborative process for making changes to CLEC-specific pre-order, order, and repair interfaces. The re-designed CMP defines four OSS Interface Change Request (CR) types. CLEC Originated and Qwest Originated OSS Interface CR types are prioritized exclusively by the CLECs.</p> <p><u>Regulatory and Industry Guideline OSS Interface CR types, which can be initiated by either a CLEC or Qwest are not subject to prioritization regardless of the source of origination.</u></p>	<p>Analysis</p> <p>CLECs have proposed that regulatory CRs should be subject to prioritization along with all other types of Change Requests, with the condition that for any mandated Regulatory Changes that have mandatory implementation dates, prioritization would not interfere with Qwest's ability to meet those dates.</p> <p>Industry Guideline changes are rarely mandatory so there would generally be no basis for putting these changes ahead of other change requests and they should be prioritized.</p> <p>The standard for determining into which category a given change requests falls requires agreement between Qwest and CLECs. There is recent experience that shows the significance of the needs for clear guidelines on defining the appropriate CR category.</p>
E 3112	Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces.		
	<p>Testing Issue:</p> <p>KPMG Consulting has observed that Qwest does not</p>	<p>Qwest Response</p> <p>Qwest provided an "integration document" to KPMG via the data request process. The</p>	<p>AT&T Comments</p> <p>AT&T finds that the criteria cited by KPMG for the competency of the</p>

d). The CMP does not address issues reasonably defined as CMP issues			
have a documented production support process in place to resolve time-sensitive production support issues and changes. KPMG Consulting formally identified this issue in Observation 3052. In response, Qwest provided KPMG Consulting with documents that specify OSS contingency plans. KPMG Consulting reviewed Qwest documentation, and determined that Qwest does not have a distinct, consolidated process document to address the issue in question.	Integration Document addresses criteria A and criteria C – G of this exception. Criteria B refers to evaluation, categorization, and prioritization procedures. The Wholesale CMP prioritization document has not been finalized, pending the completion of CMP Redesign. This portion of the redesign effort is anticipated to be completed by February 19, 2002. Qwest will provide an update on the status of this item by February 22, 2002. Qwest is in the process of making revisions to the Integration Document that address documentation management procedures and training procedures identified in criteria H & I above. Qwest will provide an updated version of the Integration Document by February 22, 2002 that will address criteria H and I.	production support process are reasonable. These are: A. Identification and verification procedures; B. Evaluation, categorization, and prioritization procedures; C. Internal and external communication procedures; D. Status tracking and reporting procedures; E. Escalation procedures; F. Restoration and closure procedures; G. Testing procedures, including support for defects observed in test environments; H. Documentation management procedures; and I. Training procedures.	
 O 3052	Qwest's February 22, 2002 updates to its CMP and "Integration Document" need to be evaluated by KPMG to help in closing this Exception.		
Contingency plans do not provide for a process to address problems encountered in production systems			
	Testing Issue: Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. KPMG Consulting observed that Qwest CMP does not have	Qwest Response 11/15/01: Qwest confirmed that contingency plans exist and described its internal process. 11/28/01: Qwest provides KPMG with contingency plans and/or processes that exist to correct potential failures in the production versions of OSS interfaces via the usual data request process (DR no. TI-676S1) for the following systems: CPPD (CPS), CRIS,	Analysis Qwest and CLECs did discuss and tentatively agree upon production support language for the redesigned CMP. One significant part of that process that has not yet been addressed is a technical escalation process to address problems that are not being worked to resolution in a timely manner.

<p>d). The CMP does not address issues reasonably defined as CMP issues</p>	<p>a documented process to address production support changes.</p> <p>KPMG further indicated that through its review of Qwest OSS contingency documents, it found no specific references to, and consideration of, Qwest interactions with CLECs</p> <p>These contingency plans illustrate fragments of a production support framework, but do not constitute a comprehensive process that defines how this change category is integrated into the overall CMP.</p>	<p>EXACT, JABS, IMA, and MEDIACC/CEMR. Still outstanding are documents for two other systems: HEET and TELIS.</p> <p>12/5/01: Qwest provides KPMG with the documents for HEET, but not TELIS stating that those documents are proprietary to a vendor.</p> <p>12/28/01: Qwest states that it has negotiated a production support document with CLECs for the CMP process. Qwest further states that he Qwest Wholesale Systems Help Desk will update its methods and procedures and conduct training by January 3, 2002 to ensure that Help Desk personnel follow the procedures outlined in the CMP Production Support document</p>	<p>The CMP language for production support was completed (except for the technical escalation process) at the CMP Redesign meeting held on December 10 – 11, 2001. At that meeting, the Qwest SME stated that the production support process would not be implemented before February 2002 (this is reflected in the draft minutes from the meeting). Qwest's response to KPMG that it would be implemented by January 3, 2002 should be questioned.</p> <p>Qwest has provided eight (8) Supplemental Responses to this Exception and continues to supply additional information to KPMG to resolve the underlying issues. The Change Management Process and the Qwest "Integration Document" are the primary documentation systems that Qwest will employ to resolve the issues.</p>
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EXHIBIT H

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

Request for Comments on Long Term PID Administration

Background

As part of the Regional Oversight Committee's (ROC's) third party test of Qwest Operations Support Systems (OSS), the ROC Technical Advisory Group (TAG) has collaboratively developed a set of performance indicator definitions (PIDs) that define Qwest's on-going performance measures. This PID development effort was mostly accomplished during 2000 and the first half of 2001. Since then, there has been a degree of on-going activity related to the maintenance and improvement of the ROC PIDs. These activities include refinements to the approved PID definitions due to audit and OSS test findings, evaluation of newly proposed PIDs and suggested changes to PIDs resulting from Qwest product and process changes. In addition, the standards for selected new PIDs which initially were categorized as "Diagnostic" or "To be Determined" have been reviewed by the TAG based on the availability of several months of actual performance data.

To date, the on-going administration of the ROC PIDs has been handled in the ROC OSS Test TAG forum. When the ROC OSS Test is completed, it is expected that the ROC TAG will be dissolved because its main purpose was to assist with the OSS test. However, once the OSS test is completed, it is expected that the PIDs will continue to be utilized as the basis for Qwest's performance reporting for several years. The TAG has determined that some level of on-going PID administration is required to support performance reporting and that the scope, form and structure should be determined on a collaborative basis prior to the end of the OSS test and dissolution of the TAG. It is anticipated that this approach will provide for seamless PID administration going forward.

Purpose of this Document

The ROC Executive Committee has determined, and parties agree, that for the duration of the test, the ROC TAG should continue to be the forum for administration of the PIDs, both test impacting and non-test related PIDs. Issues that cannot be resolved collaboratively by the TAG should be referred to the Steering Committee for resolution. The purpose of this Request for Comments is to solicit input from the parties on scope, form and structure of an entity to oversee PID administration after the ROC OSS test is completed.

Questions for Consideration

Preliminary discussions in the TAG have indicated that the parties agree that an entity is needed for on-going PID administration in a post-test environment. The discussions also included review of a paper on this topic prepared by Wayne Hart of the Idaho staff. A copy is inserted here for your easy reference.



"post test tag role
final.doc"

Please respond to the following questions regarding structure and process.

1. Once the ROC OSS test is completed, should the ROC PIDs be administered by a ROC-based entity similar to the ROC OSS TAG, Steering Committee and Executive Committee structure used for the test?
2. If the answer to question #1 is yes, please indicate how that should be accomplished, such as by extension of the current ROC TAG, development of a new TAG specifically for PID administration or any other suggestions.
3. If the answer to #1 is no, please describe your recommendations for achieving a PID administration entity and process outside of the ROC.
4. What should the scope of the PID administration function be? i.e. changes to PIDs, oversight of audits, etc? Should the scope of the function be extended beyond PID administration? If so, to what?
5. What should be the design of the management and governance structure?
6. How should the PID administration process work?
7. How should any costs of PID administration be funded?
8. How frequently should PID administration activities be conducted?
9. What are your views on the length of the initial charter/sunset timeframe of this function?
10. What other comments do you have regarding on-going PID administration in a post-test environment?
11. Absent a multi-state approach to PID administration, how should PIDs be administered and incorporated into individual state PAPs?

ROC Test of Qwest OSS

Comment Filing

Parties should sent comments to Denise Anderson at denise.anderson6@verizon.net by COB on Monday, February 11th, 2002 with a copy also sent to the TAG distribution. For more information, please

Next Steps

1. TAG comments on the above questions are due by COB February 11th, 2002
2. MTG will provide a summary of the comments by February 18th, 2002
3. As suggested by the parties, one or more conference calls/meetings will be scheduled during the weeks of 2/18 and 2/25 to provide the opportunity for the interested parties to collaboratively agree on a PID administration proposal for consideration by the TAG, ROC and States
4. MTG will provide an update on the status of this effort to the ROC Executive Committee at its March 5th meeting
5. Additional meetings to finalize the proposal will be held as required.
6. When the interested parties have agreed on one or more proposals for consideration, the materials will be presented to the TAG.
7. Once reviewed by the TAG, the proposal(s) will be presented to the Steering Committee, Executive Committee and ROC. Assuming all entities support the approach, the ROC will then likely seek formal State participation through a letter of solicitation.

Contact

For more information, please contact Denise Anderson, ROC Project Manager, at 760-668-4886 or denise.anderson6@verizon.net.

EXHIBIT I

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

Request for Comments on Long Term PID Administration

Background

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The ROC Executive Committee has determined, and parties agree, that for the duration of the test, the ROC TAG should continue to be the forum for administration of the PIDs, both test impacting and non-test related PIDs. Issues that cannot be resolved collaboratively by the TAG should be referred to the Steering Committee for resolution. The purpose of this Request for Comments is to solicit input from the parties on scope, form and structure of an entity to oversee PID administration after the ROC OSS test is completed.

ROC Test of Qwest OSS

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Preliminary discussions in the TAG have indicated that the parties agree that an entity is needed for on-going PID administration in a post-test environment. The discussions also included review of a paper on this topic prepared by Wayne Hart of the Idaho staff. A copy is inserted here for your easy reference.



"post test tag role
final.doc"

Please respond to the following questions regarding structure and process.

1. Once the ROC OSS test is completed, should the ROC PIDs be administered by a ROC-based entity similar to the ROC OSS TAG, Steering Committee and Executive Committee structure used for the test?

AT&T Response – Yes, AT&T believes the PIDs should be administered in a multi-state, industry-wide forum. The PIDs were designed to measure the performance of Qwest processes that generally do not have state-to-state variances. Common administration of the PIDs will offer time and cost efficiencies that would be lost in multiple, state-specific administration.

AT&T believes the ROC OSS TAG, Steering Committee and Executive Committee structure has been quite successful in reaching agreement on literally hundreds of PID related issues. When agreement was not possible in the ROC OSS TAG, the Steering Committee and Executive Committee appeal processes proved they could make expeditious and reasoned decisions.

Since the creation of the ROC OSS TAG, Steering Committee and Executive Committee, other multi-state, industry-wide groups have been created. The Change Management Process exists and contains two essential elements. The first element is for the administration of changes to Qwest's OSS. The second element is for changes to Qwest's products and processes. In addition to the two CMP elements, QPAP issues point towards a multi-state, industry-wide approach to periodic plan reviews, periodic audits of the performance measurement systems and modifications to either the QPAP or the PIDs. For example, it would be an inefficient use of time and resources to have fourteen individual audits of the same Qwest performance measurement systems and processes.

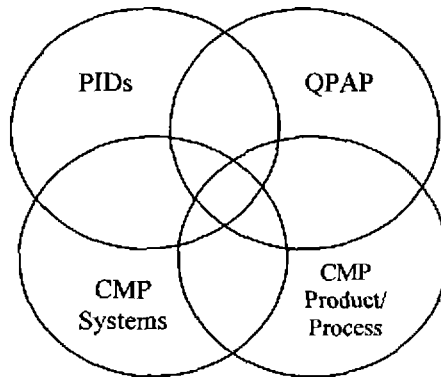
While the groups and mechanisms for the administration of PIDs, CMP Systems and CMP Process and Product have been separately developed, it has become increasingly clear that there is much overlap between the functions. Change requests submitted by CLECs in the CMP Process and Product forum have been denied because Qwest

ROC Test of Qwest OSS

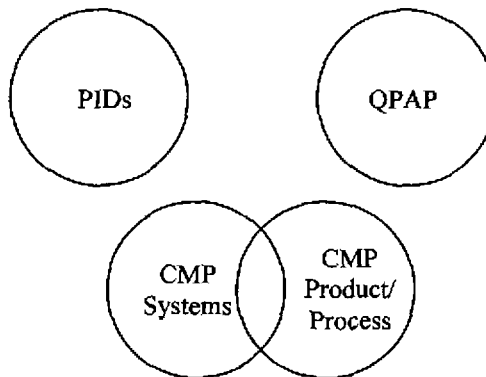
considered the request a PID-related issue. Changes in Qwest's processes or new Qwest processes developed through the CMP Process and Product forum have created a need for new or modified PIDs to measure the performance of the new or modified process.

In addition to the overlap between PIDs, and the CMP Systems and CMP Process and Product elements, the still developing PAPs are adding to the overlap. For example, Qwest has submitted change requests in the CMP Systems forum to address its potential payment liabilities under the Colorado PAP. Also, since the various QPAPs rely upon the PIDs, there should be no question that the QPAPs, in whatever form, will overlap with PID administration.

AT&T views the natural interrelationship between the four functions as follows:



While AT&T believes the above diagram represents the nature of the interrelationships, the reality to date has been more like the below diagram:



It has been AT&T's experience that important issues that are partly PID-related and partly CMP Process and Product-related have been lost in the cracks between the CMP and the ROC OSS TAG. When raised in the CMP Process and Product forum Qwest has deemed the issue PID-related that is outside the scope of that forum. When raised in the ROC TAG, Qwest has argued that the issue is not appropriate for discussion because it impacts upon Qwest's products or processes. AT&T is concerned that if the natural interrelationships are permitted to continue to be ignored, Qwest can use the gaps

ROC Test of Qwest OSS

between the forums to delay issues important to the CLECs from being addressed or to keep the issues from being addressed altogether.

While the Request for Comments is limited to long term PID administration, AT&T believes one of the more important goals in the development of the Post-271 administrative environment is to ensure that there is a means to keep issues from falling into the cracks between the various forums.

AT&T is not proposing one super-group to cover PIDs, PAP, and CMP systems, product and processes changes. However, any model that is developed must recognize and accommodate the need for joint discussion across one or more of these groups. For example, one desired change may impact upon Qwest systems, PIDs, and the PAP. The model should permit joint discussions on the impact of the change between the CMP elements and the PID and PAP administration groups.

2. If the answer to question #1 is yes, please indicate how that should be accomplished, such as by extension of the current ROC TAG, development of a new TAG specifically for PID administration or any other suggestions.

AT&T Response – For the administration of PID related issues, AT&T suggests that the ROC TAG, Steering Committee and Executive Committee model be followed. That model has a proven track record of success. However, to accommodate any concerns of an appearance of delegation of a Commission's authority to the ROC group, AT&T suggests that a final layer of administration be added to the top of the ROC model. That layer would be the right of any party to appeal an agreement or decision from the ROC group to the individual state commissions.

A combination of the multi-state, industry wide ROC model with the right of appeal at a state commission takes advantage of the efficiencies of the collaborative model while still preserving and recognizing the authority of the individual state commissions. A model that permits the ROC group to do the "heavy lifting" of identifying the issues, creating a record and proposing consensus agreements or resolution of disputed issues while providing ultimate authority to the state commissions will ensure that full and complete records are before the commissions. It should also result in much quicker resolution of issues across multiple states.

For the parties that may not have the resources to participate in the multi-state, industry-wide process (i.e. small CLECs and various offices of consumer counsel), the ability to appeal issues to the individual state commission ensures that the "price of admission" to the multi-state, industry-wide process is not a barrier to participation at the state level.

3. If the answer to #1 is no, please describe your recommendations for achieving a PID administration entity and process outside of the ROC.

AT&T Response – Not applicable.

ROC Test of Qwest OSS

4. What should the scope of the PID administration function be? i.e. changes to PIDs, oversight of audits, etc? Should the scope of the function be extended beyond PID administration? If so, to what?

AT&T Response – AT&T believes that scope of the PID administration function should include the following activities:

- Requests to delete or add PIDs;
- requests to modify existing PID language;
- selection of auditors for periodic and CLEC-requested audits;
- oversight over the scope of periodic and CLEC-requested audits;
- interpretation of PID language; and
- determinations of standards to be applied to PIDs (i.e. parity, benchmarks, diagnostic or TBD).

Apart from the scope of the PID administration activities, AT&T believes the PID administration function should perform the following roles:

- Provide a forum for individual or collective parties to raise and discuss PID-related issues (whether brought forth initially in this forum or brought in as a result of CMP or PAP issues);
- attempt to drive the parties towards a consensus decision;
- when consensus is achieved, record the results of the decision;
- when consensus is not achieved, assist in the preparation of the evidence to support the opposing positions;
- resolve disputed issues; and
- provide for an appeal process if a party disputes the result of the initial dispute resolution.
- Coordinate/collaborate with the CMP body and parties involved in PAP discussions, to the extent those groups raise issues that relate to or impact PIDs.

5. What should be the design of the management and governance structure?

AT&T Comment – AT&T believes the management and governance structure should be similar to the one employed during the ROC test. Each of the participating states would have one representative on the Steering Committee. The Executive Committee would contain seven Commissioners from the participating states.

6. How should the PID administration process work?

ROC Test of Qwest OSS

AT&T Response – The parties already have the benefit of the existing PIDs. As a result the administration should be devoted primarily to fine-tuning of the existing PIDs as well as additions of new PIDs and deletions of PIDs that are no longer needed. The activities that would generally be considered PID administration are also many of the same activities that are identified as being part of the six-month QPAP review. AT&T believes the PID administration function should be considered the same as the PID activities identified in the six-month review. Efficiency would dictate that a PID issue raised and resolved in the PID administration function should not have to be once more addressed as part of the six-month review process (although some may be implemented at this point). As part of the six-month review process, increased attention will be devoted to PID issues. However, the process should permit PID issues to be raised and addressed at any time.

The administration process itself should follow the process used during the ROC test. Any party can raise a PID issue. Once an issue is raised, one or more conference calls will be established to discuss the issue. If consensus on the issue can be reached, the PID will be modified to reflect the agreement. If agreement cannot be reached, the opposing parties will prepare impasse statements proposing a solution and advocating why that solution should be chosen. The Steering Committee will review the impasse statements and reach a decision. If there is no appeal, the decision will be implemented. If a party disagrees with a decision of the Steering Committee, it can appeal the decision to the Executive Committee. The opposing parties will have an opportunity to supplement their originally filed impasse statements. The Executive Committee will review the relevant documents and render a decision. If there is no appeal, the decision will be implemented. If a party disagrees with the decision of the Executive Committee it can appeal the decision to the participating states.

7. How should any costs of PID administration be funded?

AT&T Response – As an initial matter, Qwest should be responsible for its own costs as it administers and maintains the PIDs and the systems and processes supporting the PIDs. For any other costs, AT&T believes the funding of PID administration should first come from Tier 2 funds that are paid pursuant to the QPAP. If the Tier 2 funds are insufficient to cover all the costs of PID administration, Qwest should be responsible for the balance.

AT&T recommends that withdrawals from the individual state's Tier 2 funds to support PID administration should be made in the same relative percentages as Qwest made the Tier 2 payments. For example, if out of all of the total Tier 2 payments that Qwest made to all of the states, Wyoming obtained 10%, then 10% of the funds necessary to cover the PID administration would come from Wyoming's Tier 2 funds.

8. How frequently should PID administration activities be conducted?

AT&T Response – As previously discussed, the PID administration function should be considered the six-month review process. Consequently, there should be increased

ROC Test of Qwest OSS

attention on PIDs every six months. However, the PID administration activities should also permit on an as needed basis, other PID issues to be addressed.

9. What are your views on the length of the initial charter/sunset timeframe of this function?

AT&T Response – The PID administration function should exist, at a minimum, until there is no Qwest performance assurance plan in effect. Once, a Qwest Performance Assurance Plan has expired, the participating Commissions should review the appropriateness of the PID administration function to determine if it should be continued.

10. What other comments do you have regarding on-going PID administration in a post-test environment?

AT&T Comment – AT&T has no other comments.

11. Absent a multi-state approach to PID administration, how should PIDs be administered and incorporated into individual state PAPs?

AT&T Comment – AT&T's strong preference is that PID administration be performed on a multi-state basis. However, if that is not possible, then the alternative would be to have any PID administration issues handled on a state-by-state basis. Should a party wish to change any aspect of the PIDs, the party would have to seek to have the change made in each of the appropriate states and have that change incorporated into the PAP.

Comment Filing

Parties should sent comments to Denise Anderson at denise.anderson6@verizon.net by COB on Monday, February 11th, 2002 with a copy also sent to the TAG distribution. For more information, please

Next Steps

1. TAG comments on the above questions are due by COB February 11th, 2002
2. MTG will provide a summary of the comments by February 18th, 2002
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4. MTG will provide an update on the status of this effort to the ROC Executive Committee at its March 5th meeting
5. Additional meetings to finalize the proposal will be held as required.
6. When the interested parties have agreed on one or more proposals for consideration, the materials will be presented to the TAG.
7. Once reviewed by the TAG, the proposal(s) will be presented to the Steering Committee, Executive Committee and ROC. Assuming all entities support the

ROC Test of Qwest OSS

approach, the ROC will then likely seek formal State participation through a letter of solicitation.

Contact

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EXHIBIT J

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

OBSERVATION 3068 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 11, 2001
First Response Date: January 6, 2002
Second Response Date: January 15, 2002

OBSERVATION REPORT

An observation has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the OSS Interface Development Review, Test 24.6.

Observation:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs sufficient troubleshooting capabilities.

Background:

Prior to a CLEC's entering Qwest's IMA production environment, Qwest allows the CLEC to choose between SATE and Interoperability ("Interop") for testing EDI transactions. For testing, CLECs use a combination of Data Documents (SATE), Scenario Templates (Interop), and Disclosure Documents (both environments) to understand the business rules that are necessary to populate EDI transactions. The Qwest Implementation Team provides support to the CLEC for progression testing, while a SATE support team provides guidance to CLECs performing regression testing. Once testing commences, a CLEC must rely on existing documentation or Qwest personnel to troubleshoot any problems encountered with its EDI transactions.

Issue:

KPMG Consulting has observed, through interviews and documentation reviews, that Qwest does not provide CLECs with examples of translated EDI input and output files for SATE test transactions. Thus, CLECs are not able to effectively troubleshoot problems with EDI transactions, as Qwest does not provide the exact EDI input and output files for a "known set of good transactions." If the EDI code were made available, these initial transactions could be run by the CLEC to determine if the interface is working properly. This would help CLECs later to isolate any EDI problems encountered during testing, by increasing the likelihood that an identified issue relates specifically to the transaction submitted, rather than to the underlying interface code. The lack of EDI input and output files for these known good transactions increases both the time and effort necessary to troubleshoot EDI transactions being tested. Furthermore, if available, CLECs could use the coding information to better conduct root cause analysis of any problems experienced during transaction testing.

KPMG Consulting acknowledges that Qwest is working collaboratively with the CLEC SATE user community, and has scheduled a series of meetings to enhance performance and functionality of the current system. Qwest indicated during the SATE Enhancement Meeting on Tuesday, November 27, 2001, that it will propose a Change Request (CR) to develop X12 EDI transaction examples for some of the products that SATE currently supports. These examples

OBSERVATION 3068 – SECOND RESPONSE

Qwest OSS Evaluation

will use data that are different from the data currently used for the test deck, but that are still valid for understanding the manner by which to correctly populate an order. The examples will be intended to provide guidance to CLECs that are attempting to create and test orders in SATE.

Although the proposed CR will address some of the issues included in the context of this observation, under the terms of the Qwest proposal, CLECs will not benefit from exact EDI transaction examples for every product, using actual test environment data to troubleshoot problems that are encountered during testing. Therefore, even after the implementation of Qwest's proposed CR, CLECs would still not have complete and sufficient troubleshooting capabilities at their disposal. Furthermore, this proposed change has not yet been prioritized by the CLEC community, and would not be able to be implemented until IMA Release Version 10 or 11 at the earliest.

In a Qwest Change Management email notification sent on November 26, 2001, Qwest described two business purposes for testing in SATE, as follows:

Definition of Real World Scenario Testing

When testing in the Stand-Alone Test Environment, a CLEC generally has one of two basic business purposes. The first is interface testing where a CLEC is testing for expected results so as to test their interface. They may send an LSR such that they will receive a Business Process Layer (BPL) error. This would be done in order to test that one's software can properly receive that error. The second is "real world scenario testing" where no result is specifically expected. When real world scenario testing, when a CLEC sends an LSR or pre-order request to Qwest they are asking "what" would happen to this specific LSR if the world of telephone numbers and circuits in SATE existed in Qwest's Production Network and this specific LSR was sent to Production. Test cases, purpose, and processes for "real world scenario testing" are different from those for interface testing.

KPMG Consulting agrees that SATE offers CLECs the capability to test both the interface system (code), as well as the business rules that would apply in Qwest's Production Network when sending LSRs or pre-order requests. However, KPMG Consulting disagrees that the test cases and processes for real world scenario testing must be different from those used for interface testing.

Impact:

Insufficient troubleshooting capabilities could delay a CLEC's timely IMA EDI implementation. CLECs could experience unnecessary time and effort attempting to resolve EDI transaction problems that could be more immediately resolved through a streamlined process in which EDI input and output files associated with test case scenarios and transactions are provided, in advance, by Qwest.

OBSERVATION 3068 – SECOND RESPONSE

Qwest OSS Evaluation

Qwest Formal Response (01/26/01):

During the SATE Users' Group Meeting on November 13, 2001, a request was made for example X12 transactions. In response to that request, Qwest agreed to research whether this request was possible and to return to the next meeting with a proposal.

In the next meeting on November 27, 2001, Qwest proposed providing example EDI mapping examples for each product and activity and pre-order function supported in SATE, populated with non-SATE data. Qwest explained that by providing input transactions populated with SATE data, there would be no way to verify the CLEC could populate the data properly on their test transactions to move to production. This would increase the risk for both the CLEC and Qwest when moving a CLEC to the production interface. The CLECs participating on the call, including the CLEC requesting the example transactions, agreed that example transactions with non-SATE data would meet their needs. Following is the action item on this topic from the November 27, 2001 SATE User Group Meeting Minutes:

- Qwest will develop some options for providing X12 EDI mapping examples of the test data. 11/27/01. Qwest proposed to provide sample X12 EDI mappings populated with non-SATE data. The CLECs attending agreed to this approach.

Based upon the CLEC response, Qwest believes that populated example X12 transactions with non-SATE data will allow CLECs to properly and easily troubleshoot any testing issues.

Qwest acknowledges that this proposed change has not yet been prioritized by the CLEC community, and would not be able to be implemented until IMA Release Version 10 or 11 at the earliest. Prioritization by the CLECs through the Change Management Process will determine for which release this capability is available. Qwest will submit this issue for CLEC prioritization at the next CMP meeting.

The meeting minutes from both of these SATE Users' Group Meetings are attached.

Qwest believes that the processes for "real-world scenario testing" are different from those used for interface testing because of the nature of testing performed. In interface testing, a CLEC is testing with the intent to receive a known static response. The goal is to ensure that the CLECs transactions can be received by Qwest and in return, the CLEC can receive Qwest's responses. In real-world scenario testing, the CLEC is testing to determine how an entered scenario would be processed with all of the variables allowed by the production system, including flowthru. As a result, the responses in real-world scenario testing are unpredictable and not conducive to interface testing.

KPMG Consulting's First Response (01/06/02):

As stated in the initial release of this Observation, KPMG Consulting acknowledges that Qwest, through a series of user group meetings, has worked directly with the CLEC community to determine functional enhancements to SATE. KPMG Consulting further acknowledges that a Change Request (CR) has been created by Qwest to provide X12 EDI mapping examples for

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each product and activity and pre-order function supported in SATE, populated with non-SATE data. Additionally, in Qwest's response dated December 19, 2001, Qwest stated the following:

"Qwest acknowledges that this proposed change has not yet been prioritized by the CLEC community, and would not be able to be implemented until IMA Release Version 10 or 11 at the earliest. Prioritization by the CLECs through the Change Management Process will determine for which release this capability is available. Qwest will submit this issue for CLEC prioritization at the next CMP meeting."

Although it appears that Qwest's proposed CR provisions, when implemented, will adequately address the issue of providing sufficient troubleshooting capabilities to CLECs, this CR has not yet been prioritized through Qwest's Change Management Process (CMP). Once prioritized through the CMP, several major releases of IMA may need to occur before this CR can be implemented. KPMG Consulting cannot determine that the issue raised in this Observation has been sufficiently addressed until the proposed action has been fully implemented by Qwest.

Qwest defines "real-world scenario testing," as stated in the response to this Observation, as follows:

"In real-world scenario testing, the CLEC is testing to determine how an entered scenario would be processed with all of the variables allowed by the production system, including flowthru. As a result, the responses in real-world scenario testing are unpredictable and not conducive to interface testing."

KPMG Consulting is unclear as to why the responses in real-world scenario testing are unpredictable. Functional results, not actual data records, from test scenarios submitted through the SATE testing environment should mimic the production environment.

KPMG Consulting recommends that Observation 3068 remain open until Qwest has fully implemented all provisions of the proposed CR, and has notified the CLEC community of the changes enacted.

Qwest Response to KPMG's Comments (01/11/02):

After evaluating the CR, Qwest determined that the request for populated EDI maps only has documentation impacts and no system impacts. As a result, Qwest is able to implement this CR independent of a SATE release.

The effort to create example populated EDI maps for all SATE supported products and activities is extensive. Qwest will create a new document to contain these examples. While the effort is release independent, the document will be a release specific document created for release 9.0 by 03/08/02. This will be issued to the CLEC community using the Release Notice process.

As to the "real-world scenario testing" question from KPMG, Qwest did not intend to imply that the responses issued during "real-world scenario testing" did not mimic production. These responses will mimic the world of production flow through. However, as a CLEC may not

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understand all flow through rules and processes, the CLEC's ability to predict a transaction's outcome may be difficult. In this sense, "real-world scenario testing" is more unpredictable than other SATE testing.

Although nothing in Qwest's EDI implementation processes will preclude a CLEC from using "real-world scenario testing" as interface testing cases, it may be easier for a CLEC to use the more predicable VICKI responses when performing implementation or migration testing. A CLEC can choose to use "real-world scenario testing" or interface test scenarios and their responses to meet the requirements of moving to production.

KPMG Consulting's Second Response (01/15/02):

Based on Qwest's January 11, 2002 response, KPMG Consulting acknowledges that the proposed documentation may satisfy the concern outlined in this Observation. However, in its response, Qwest stated that the effort to prepare example EDI input and output files for known good transactions will not be completed until on or before March 8, 2002. Once the proposed documentation for populated EDI maps is publicly released, and the CLEC community is notified, KPMG Consulting will review the documentation to ensure that it adequately addresses the issue raised in this Observation.

KPMG Consulting recommends that Observation 3068 remain open until Qwest completes the proposed EDI sample map documentation, and it has notified the CLEC community of the changes enacted.

Attachment(s): None

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Initial Release Date: November 7, 2001

First Response Date: January 8, 2002

Second Response Date: January 24, 2002

EXCEPTION REPORT

An exception has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the Test 24.6 OSS Interface Development Review.

Exception:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs sufficient testing capabilities.

Background:

Qwest employs a phased approach for CLECs that wish to develop an IMA/EDI application-to-application interface with Qwest's OSS systems. The steps of the current process are listed below:¹

1. Initial Communications (includes Kick Off conference call)
2. Project Plan (proposed/negotiated)
3. Requirements Review (by the CLEC)
4. Firewall Rules and IA-to-IA Testing
5. Testing - Interoperability and/or SATE environment
6. Controlled Production
7. Production ("Turn-Up")

Qwest developed SATE in May 2001 as an alternative testing environment to the Interoperability environment. By creating SATE, Qwest now offers CLECs the option between the Interoperability environment and SATE for testing their IMA EDI interface. The latest version, SATE 8.01, was implemented as of October 22, 2001.

Issue:

KPMG Consulting has observed through interviews and documentation reviews, that the IMA EDI SATE does not provide sufficient testing capabilities for CLECs prior to connecting to Qwest's production systems. Certain limitations in the IMA EDI SATE have been identified, including the following:

- SATE does not offer true end-to-end testing capabilities through to Qwest's provisioning and billing systems. Currently, SATE does not generate post-order responses in the same manner as they are created in the production environment. Specifically, a Test System Engineer

¹ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.6.

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(TSE) manually provides responses to the CLEC that would be system-generated in the production environment (e.g. firm order completion notices, and other post-order responses such as rejections). Manual response generation is not representative of the production environment, and does not provide adequate assurance that CLECs will see similar transaction behavior once in production. Additionally, manual intervention increases the risk of human error.

- Flow-through orders are not supported in SATE, even though these types of orders will be processed in the production environment. Therefore, CLECs are unable to truly test the ability of orders to flow-through (no manual intervention) the IMA systems in production. CLECs will only have limited ability to evaluate the behavior of the system in a manner that is consistent with flow-through orders in production. A test environment should mirror the production environment, and provide evidence of what is to be expected when entering production, including flow-through behavior.
- The volume of order responses supported in SATE is restricted due to manual response handling. As stated in the IMA EDI Implementation Guidelines²:

“As with the Interoperability environment, Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardys, and Completions. Responses will be generated on posted SATE operation business days as follows:

- FOCs - each day for the first ten Order transactions received the prior business day.
- Progression responses - as negotiated in Project Plan
- Regression responses other than FOCs - within 5 days of a request for a response”

The number of responses that a CLEC receives in automated format should not be restricted. Because SATE does not support automated response handling, the CLEC can only receive a prescribed number of responses to its order transactions. This capacity limitation does not adequately mirror the production process, and does not allow the CLEC the ability to test large volumes of orders and the expected response behaviors.

- The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses. According to the IMA EDI Implementation Guidelines³:

“In SATE, pre-order and order transactions are created using Qwest-provided data that, when submitted to SATE, will return consistent responses. These responses will enable the SATE user to test the EDI mapping structure. *Those responses will hold data that could appear in production, however, may not match the response that would be received on the same query sent to the Interoperability or Production Environment.*

² EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.16.

³ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.15.

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The error codes returned in SATE will mirror the Production environment. *Verbiage on outbound responses in SATE may not exactly mirror what would be returned from Qwest production systems or represent the actual message/data content expected from the result of the transaction.*"

The inability to provide consistent data within the EDI order responses impacts the CLEC's ability to accurately assess the expected outcomes of orders. Additionally, it impairs the CLEC's ability to analyze EDI problems when the CLEC cannot consistently compare actual data outcomes to expected data outcomes.

As a result of an interview with a Qwest employee on September 12, 2001, KPMG Consulting requested clarification for the paragraph quoted above from the EDI Implementation Guide (Data Request No. ID128). Qwest responded that identical queries created in SATE and production may receive different responses due to the differences between the test deck data in SATE and the account data in production. Qwest specifically stated⁴:

"For example, an address validation query for "999 Van Cleve Rd" would result in an "Exact Match" in SATE, but "No Match" in production. Alternatively, the address "1999 Broadway" would result in an "Exact Match" in production, but no match in SATE."

KPMG Consulting understands that the differences in the test deck data could potentially yield different results in SATE and production. As long as the processing logic in SATE and production is identical, this is not considered a system deficiency. However, Qwest continues in its response as follows:

"Second, SATE stubs do not hold some of the error messages held in production. For example, a query in production for a certain telephone number might result in an error message that says "Host Not Found." In SATE, the CLEC might receive "Bad NPA/NXX." In all cases, the error message received will be a real production error message and in all likelihood, it will be the error message received on such a query, however, such functionality cannot be guaranteed. If a CLEC would like to receive a certain error message in SATE, they can request it be added via the SATE Data Request Process."

KPMG does not understand how different error messages could be received in SATE versus production for identical queries. The response processing logic for SATE should replicate the logic in production, and therefore, no differences should exist between the error messages received in the two environments for identical queries. Based on Qwest's clarification, KPMG Consulting still believes that there is a potential deficiency with SATE in that response data is not necessarily consistent with production.

Impact:

⁴ Qwest response to Data Request ID128 received by KPMG Consulting on September 27, 2001

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A limited or insufficient testing environment could delay the timely implementation of a CLEC's IMA EDI release. Also, problems could arise in the production environment that may have otherwise been avoided if SATE more closely mirrored the production environment. These factors could increase a CLEC's operating expenses as a result of additional time required to ensure the functionality of the systems, and could inhibit revenues if delays hinder a CLEC's ability to service its customers.

Qwest Formal Response (11/20/01):

The following paragraphs outline Qwest's response to the four concerns raised by KPMG regarding SATE. Each issue has been briefly recapped to more easily correlate the response. Each response identifies current capabilities that are provided and if Qwest has any current plans to enhance the SATE in that area.

1. KPMG concern: SATE does not generate post-order responses in the same manner as they are created in the production environment.

Currently, a Qwest Technical Support Engineer (TSE) uses IMA to create Firm Order Confirmations (FOCs), manual rejects, jeopardies and non-fatal error transactions. IMA then automatically sends the transaction to the CLEC. This manual generation represents what the Interconnect Service Center representative's actions would be in production. However, if the LSR were to flow through, SATE and the Interop environment do not currently automatically generate the FOC, Jeopardy, or Completion that could occur in production. An automatically generated FOC, Completion and other post-order response does occur when the CLEC is performing their Controlled Production Testing.

Additionally, Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production timing of post-order transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling. While the current SATE and Interop environments allow the CLEC to test all post order transactions in their EDI interface, these changes will resolve any timing concerns or concerns resulting from manual handling.

- Note: Those post-order transactions currently done manually by an Interconnect Service Center (ISC) representative in production will not be automated. Those transactions, as well as the status updates that follow them, will be done manually using the same interface used today in production by an ISC representative.

2. KPMG concern: Flow through orders are not supported in SATE

Qwest currently works with CLECs to improve their flow through numbers and help CLECs improve their business processes to achieve greater flow through in two ways. First, Qwest as

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part of its standard EDI implementation process educates CLECs on the key elements affecting flow through. Second Qwest works weekly on an individual basis as needed to provide training that can help a CLEC improve its flow through numbers. This training allows a CLEC to improve its business process, while SATE testing focuses on interface testing and therefore the timing based scenarios referenced in Item 1 above.

Additionally, Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have their transaction sent through the test flow through systems, only flow through eligible LSRs will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful. CLECs will also be able to contact Qwest regarding the flow through of those LSRs sent to SATE for flow through testing.

3. KPMG concern: The volume of order responses supported in SATE is restricted due to manual response handling.

First, Qwest does not currently limit the number of post order transactions sent to those CLECs working to implement an EDI interface with Qwest or migrating to a new release of IMA. Qwest only limits the number of post order transactions within a certain window for those CLECs in regression testing. Qwest will however update its EDI Implementation process and the EDI Implementation guide by 12/03/01 to allow CLECs in regression testing to negotiate post-order transaction testing processes. At a CLEC's EDI kick-off conference call, Qwest will negotiate the number of, and manner in which, manual post-order transactions will be sent. The current process, previously agreed to via a CLEC vote, will be used as a starting point for all negotiations.

Second, the post order automation referenced in Item #1 will provide the CLECs with two enhancements. It insures that production timing and scenarios can be tested and it eliminates the need for much of the manual handling done for post order transactions in SATE today. For most post order transactions, a CLEC will no longer need to contact Qwest and request a manual post-order transaction be sent. They can request the specific transaction be sent as part of their test scenario and it will automatically be sent as a result. For those transactions still requiring manual handling (transactions manually handled by an Interconnect Service Center representative in production) after this automation, Qwest representatives will continue to issue responses manually as negotiated at the CLEC's EDI kick-off conference call.

4. KPMG concern: The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

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The data instances in SATE are different from production data instances in that SATE contains facilities, addresses, CSRs, and other data instances that do not exist in production. The type of data in SATE mirrors production data, but the SATE data instance is not identical to production data instances. SATE does not contain production data so that a CLEC can easily test any production scenario without concern for end-user or contract-based privacy issues. The CLEC does have the ability to test all relevant situations such as those described in the example of obtaining an “exact match” using the address “999 Van Cleve Rd”. A CLEC could test multiple situations in order to understand responses and the conditions that cause them to occur.

Second, SATE uses specific test data and planned test responses. The responses are similar to production responses as detailed below:

- SATE uses a production (or, in the month prior to an IMA release, pre-production) instance of IMA. Using a production release of IMA ensures that the condition and EDI format of all error messages sent to a CLEC are identical to those messages in production. The business rules by which a message is returned are also identical in SATE and IMA production.
- In SATE those error messages originating from a downstream system are SATE specific to test deck scenarios, which reflect actual production scenarios. These error messages are returned under the same business conditions as in production. If a CLEC wants additional test scenarios, they can request them via the SATE Data Request process.
- Qwest regularly reviews its SATE error messages to ensure that they match production error messages.

SATE allows CLECs to test their code and certify their system to IMA. A CLEC will generally not code to the content of an error message, but to the conditions of the error and the system's published APIs to ensure the flexibility of the software and to decouple the dependency of their systems on Qwest's systems. SATE returns error messages consistent with IMA business rules and EDI Disclosure Documents.

Conclusion

In addition to the above stated planned enhancements to SATE, Qwest has established a working sub-team of CMP members to further analyze and define test environment needs to ensure Qwest continues to meet the CLEC's testing objectives. The introduction of the test environment requirement sessions was done at the 10-18-01 CMP meeting and the first meeting was held on 11-06-01. Qwest has included in this meeting minutes of this first meeting. The purpose of the sessions is to collaboratively define any additional needs for the test environment. System enhancements resulting from the CLEC requirements sessions will be submitted as Change Requests to the CMP process and prioritized for implementation. The Change Requests can also include upgrades to the test scenarios that will allow the CLECs to more extensively test either their EDI interface, or their business process and LSR construction.

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Qwest Supplemental Response (12/04/01):

Qwest stated the following in the 11/20/01 formal response:

"Qwest will however update its EDI Implementation process and the EDI Implementation guide by 12/03/01 to allow CLECs in regression testing to negotiate post-order transaction testing processes."

Qwest completed the EDI Implementation process and guideline updates on 11/30/01. The EDI Implementation Guideline document is posted on Qwest's Wholesale web site at:

<http://www.uswest.com/wholesale/ima/edi/document.html>

The associated industry notification was issued on 12/3/01 with the subject line, "EDI Implementation Guidelines for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) Updated."

Qwest Supplemental Response (12/21/01):

The numbers below correspond to the number used in the 11/20/01 response:

2. *Qwest will implement the addition of flowthru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flowthru for Western region LSRs. The second phase will include implementation of all other flowthru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release.*

3. Qwest does not limit the number of response transactions a CLEC may receive while testing in SATE.

The current IMA EDI Implementation Guide reflects the following information regarding the amount of transaction responses:

In the Project Plan Development/Negotiation section (page 11):

Qwest will negotiate the number of, and manner in which, manual post-order transactions will be returned to the CLEC. The current approach for returning these responses, previously agreed to via a CLEC vote in CMP, will be used as a starting point for all such negotiations.

In the SATE Transaction Responses section (page 25):

Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardies, and Completions. Responses will be generated on posted SATE operation business days as follows:

- FOCs - each day for the first ten Order transactions received the prior business day.

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- Progression responses other than FOCs - as negotiated in the Scenario Summary

In Appendix A:

IMPLEMENTATION AREAS	PROGRESSION Interoperability Environment	PROGRESSION Stand Alone Environment	REGRESSION Stand Alone Environment
Number of Transactions Permitted	As negotiated in Project Plan	As negotiated in Project Plan	As negotiated in Usage Plan

These statements do not mean that responses are limited, only negotiated. As responses in the present environment are manual, Qwest has implemented processes to allow Qwest to ensure that proper staffing levels are available for all CLEC testing. Nothing in the above statements are intended to indicate that the volume is limited.

Additionally, when post-order responses are automated with the release of SATE 9.0, CLECs will be able to receive automated responses for their LSRs. The IMA EDI Implementation Guide will be updated accordingly. The updated IMA EDI Implementation Guide for 9.0 will be published on January 21, 2001 with an associated Release Notification.

4. All known differences between the production and IMA versions of SATE are included in the Overview section of the IMA EDI SATE Data Document. As part of the creation of the initial SATE requirements, any case where SATE had to differ from production due to a functional requirement for SATE was noted to be included in the data document.

On an ongoing basis, every candidate that is placed into IMA is placed into SATE. If the implementation in SATE causes the system behavior to differ from production, this will be added to the Overview section of the IMA EDI SATE Data Document.

The SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document in the future. The PID will test on a monthly basis that the data in the data document reflects the data in the system. This will help CLECs to feel confident that a successful test in SATE will mean a successful move to production.

Based upon the confidential information provided, Qwest observed a common theme in three of the four attached issues. Issue 1, 3, and 4 were all cases of manually generated responses not system generated responses. Thus, these are not problems with the system being out of synch with production. The implementation of automated post-order responses in SATE will resolve this issue. Qwest is modeling the content of the responses after actual similar post-order responses from production. This will ensure that the responses provided to CLECs in SATE reflect those used in production.

Issue 2 : In Qwest's CLEC CMP SATE User's Group, a CR has been created to change all SATE NPA-NXX values to utilize those that are valid in LERG.

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As part of the flowthru upgrade to SATE, Qwest must change all NPA-NXX and other central office values to match those valid in production. The flowthru system relies on valid production data. As a result, this request will be fulfilled in two phases to correspond to the SATE flowthru upgrades.

KPMG Consulting's First Response (01/08/02):

KPMG Consulting has addressed each of the points outlined in Qwest's November 20 and December 21, 2001 responses. Below, KPMG Consulting has recapped each of the major SATE issues, along with a response.

1. SATE does not generate post-order responses in the same manner in which they are created in the production environment.

In its response dated November 20, 2001, Qwest states that, "Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production timing of post-order transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling."

Based on Qwest's response and proposed SATE enhancements, KPMG Consulting understands that Qwest plans to address the issue of post-order automation within SATE. Qwest has announced the introduction of the Virtual Interconnect Center Knowledge Initiator (VICKI) that will become effective in January 2002. In its White Paper released on January 3, 2002, Qwest has reiterated the business need driving this change: "Production-like Flow Through systems are needed for a CLEC to test whether a given LSR would Flow Through if sent to production.⁵" However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment, due to its current manual handling of responses. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE.

2. Flow through orders are not supported in SATE.

In its response dated November 20, 2001, Qwest states, "Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have their transaction sent through the test flow through systems, only flow through eligible LSRs

⁵ A White Paper on Flow Through in The Stand Alone Test Environment (SATE), January 3, 2001, V1.00, p. 3.

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will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful."

Qwest further clarified the anticipated SATE flow through enhancements in its December 21, 2001 response by stating, "Qwest will implement the addition of flowthru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flowthru for Western region LSRs. The second phase will include implementation of all other flowthru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release."

Based on its responses and proposed SATE enhancements, KPMG Consulting acknowledges Qwest's plans to address the issue of flow through capabilities within SATE. However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment's flow through capabilities. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE, and confirmed and reviewed by KPMG Consulting in cooperation with end users.

3. The volume of order responses supported in SATE is restricted due to manual response handling.

In its response dated November 20, 2001, Qwest states, "Qwest does not currently limit the number of post order transactions sent to those CLECs working to implement an EDI interface with Qwest or migrating to a new release of IMA. Qwest only limits the number of post order transactions within a certain window for those CLECs in regression testing."

In its response dated December 21, 2001, Qwest quotes the latest version of the EDI Implementation Guide, stating:

"Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardies, and Completions. Responses will be generated on posted SATE operation business days as follows:

- *FOCs - each day for the first ten Order transactions received the prior business day.*
- *Progression responses other than FOCs - as negotiated in the Scenario Summary."*⁶

For SATE regression testing, the EDI Implementation Guide states:

⁶ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Section 2, Implementation Activities—Progression Testing, p.25.

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"Qwest provides FOCs each business day for the first ten product Orders received the prior business day. ISC Rejects, Jeopardies, Non-Fatals, Status Updates, and Completions are provided within 5 business days of a request for a response."⁷

Finally, Appendix A of the EDI Implementation Guide states the following regarding EDI responses⁸:

IMPLEMENTATION AREAS	PROGRESSION Interoperability Environment	PROGRESSION Stand Alone Environment	REGRESSION Stand Alone Environment
EDI Response	Provided by TSEs Qwest provides direct feedback on error conditions and responses as negotiated in the Project Plan	Provided by TSEs Qwest provides direct feedback on error conditions and responses as negotiated in the Project Plan	Provided by TSEs <i>Responses other than FOCs generated within 5 business days of e-mail request indicating specific PONs & INQNUMS needing a response.</i> FOCs sent each business day for the first ten Orders or transactions received the prior business day.

The section of Appendix A that Qwest provided in its December 21, 2001 response describes a limitation in the number of transactions submitted to SATE, not the number of post order responses received from the test environment.

For both progression and regression testing in SATE, it appears that Qwest currently places a limit on the number of FOCs generated, due to the manual handling of those responses. The other post order responses are negotiated, also due to the manual handling of those responses. This capacity limitation in SATE is not indicative of the production environment, and, therefore, is considered to be a deficiency in the test environment. Although Qwest intends to automate post order responses, as noted in Point 1 of Qwest's November 20, 2001 response, CLECs are currently constrained by the number of post order responses that they can receive in SATE. Therefore, KPMG Consulting recommends that this issue remain open until Qwest can directly address the post order capacity restraint in SATE.

4. The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

In its response dated December, 2001, Qwest states, *"All known differences between the production and IMA versions of SATE are included in the Overview section of the IMA EDI*

⁷ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Section 2, Implementation Activities—Regression Testing, p.41.

⁸ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Appendix A, p.72.

EXCEPTION 3077 – SECOND RESPONSE

Qwest OSS Evaluation

SATE Data Document. As part of the creation of the initial SATE requirements, any case where SATE had to differ from production due to a functional requirement for SATE was noted to be included in the data document. On an ongoing basis, every candidate that is placed into IMA is placed into SATE. If the implementation in SATE causes the system behavior to differ from production, this will be added to the Overview section of the IMA EDI SATE Data Document.”

KPMG Consulting’s expectation is that test environment transaction responses should mirror those from the related production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Although the known differences between the behavior of SATE and the production environment are documented in the SATE Data Document, this does not negate the fact that SATE does not completely mirror the production environment.

Additionally, in its response dated December 21, 2001, Qwest stated, *“The SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document in the future. The PID will test on a monthly basis that the data in the data document reflects the data in the system. This will help CLECs to feel confident that a successful test in SATE will mean a successful move to production.”*

Although the proposed SATE PID, when implemented, will test the data in the data document by running transactions in SATE, it does not contain provisions to run the test deck in the production environment. Therefore, it provides no assurance that the same results will be achieved in the production environment.

KPMG Consulting found specific examples, during its review of CLEC testing experiences, for which the EDI response in SATE differs from the EDI response that would be found in production. The differences relate to EDI segments and data that are normally found in production transactions, but did not appear in the equivalent SATE transactions. As per the Focus Observation & Exception Call held on Thursday, December 6, 2001, KPMG Consulting agreed to provide Qwest with specific examples for which SATE results did not match the results obtained in the production environment. KPMG Consulting provided these in a separate, confidential document.

After its review of the confidential data, Qwest stated in its response dated December 21, 2001, *“Issue 1, 3, and 4 were all cases of manually generated responses not system generated responses. Thus, these are not problems with the system being out of synch with production. The implementation of automated post-order responses in SATE will resolve this issue.”*

Qwest addresses the last item by stating, *“As part of the flowthru upgrade to SATE, Qwest must change all NPA-NXX and other central office values to match those valid in production.”*

EXCEPTION 3077 – SECOND RESPONSE

Qwest OSS Evaluation

The flowthru system relies on valid production data. As a result, this request will be fulfilled in two phases to correspond to the SATE flowthru upgrades."

Based on Qwest's review of the confidential data and its response, KPMG Consulting believes that Qwest will address these issues with the SATE planned enhancements. However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE.

KPMG Consulting's expectation is that test environment transaction responses should mirror those from the related production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions that they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Until Qwest can provide assurance that SATE produces results that are consistent with those that would be expected in the production environment, KPMG Consulting recommends that this issue remain open.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, or implement the proposed enhancements.

Qwest Supplemental Response (01/23/02):

Qwest committed to the following action item in the 12/21/01 response:

"When post-order responses are automated with the release of SATE 9.0, CLECs will be able to receive automated responses for their LSRs. The IMA EDI Implementation Guide will be updated accordingly. The updated IMA EDI Implementation Guide for 9.0 will be published on January 21, 2001 with an associated Release Notification."

Qwest completed the updates to the IMA EDI Implementation Guide on 1/22/02 (pp. 30-34). The updated document can be accessed on Qwest's Wholesale web site at: <http://www.qwest.com/wholesale/ima/edi/document.html>. The associated industry notification was issued on 1/22/02 with the subject line, "9.0 Release Implementation Guide, FAQ, IMA EDI Corrective Procedures and Error Codes Document and the FBDL EDI Corrective Procedures and Confirmation/Error Codes."

KPMG Consulting's Second Response (01/24/02):

KPMG Consulting reviewed the updated EDI Implementation Guide, dated January 21, 2002, about which Qwest notified CLECs on January 22, 2002. KPMG Consulting noted the additional and revised information relating to the upcoming implementation of the Virtual Interconnect Center Knowledge Initiator (VICKI) in SATE Version 9.0.

EXCEPTION 3077 – SECOND RESPONSE

Qwest OSS Evaluation

As stated in previous responses to this Exception, Qwest has asserted that it will be making several enhancements to SATE over the coming months. Although these enhancements are expected to collectively address the identified test environment issues, Qwest does not anticipate completing the proposed changes until May 20, 2002. Therefore, KPMG Consulting will respond to each enhancement once it has been fully implemented, and the CLEC community has been notified per the release management schedule.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, or implement the proposed enhancements.

Attachments: None



ROC Observation & Exception Formal Response

Test Vendor ID: EXP 3095

Qwest Internal Tracking ID: TI 765

Observation/Exception Title: Testing Capabilities not Offered for all Products

Test Type/Domain: Test 24 - CLEC Support Processes

Date Qwest Received: 12/12/2001

Initial Response Date: 12/19/2001

Supplemental Response Date: 01/30/2002

Test Incident Summary:

An exception has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the OSS Interface Development Review, Test 24.6.

Exception:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest products offered in production.

Background:

Qwest employs a phased approach for CLECs that wish to develop an IMA/EDI application-to-application interface with Qwest's OSS systems. The steps of the current process are listed below:¹

1. Initial Communications (includes Kick Off conference call)
2. Project Plan (proposed/negotiated)
3. Requirements Review (by the CLEC)
4. Firewall Rules and IA-to-IA Testing
5. Testing - Interoperability and/or SATE environment
6. Controlled Production
7. Production ("Turn-Up")

Qwest developed SATE in May 2001 to serve as an alternate testing environment to its Interoperability environment. By creating SATE, Qwest now offers CLECs the option of using either the Interoperability environment or SATE for testing their IMA EDI interfaces. The latest version, SATE 8.01, was implemented as of October 22, 2001.

Issue:

KPMG Consulting has observed, through interviews and documentation reviews, that the IMA EDI SATE does not offer testing capabilities to CLECs, prior to connecting to Qwest's production systems, for all Qwest resale products. The following IMA EDI SATE limitations have been identified:

¹ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.6.

- SATE does not allow for testing of all of the products that are supported in the IMA production environment. Currently, SATE only supports the following transactions²:

Pre-Order

- Address Validation (Numbered Addresses only)
- Appointment Scheduling
- Cancel TN/Appointment
- Connecting Facility Assignment
- Facility Availability (Unbundled ADSL, Convert POTS to Unbundled Loop, POTS Facility Availability)
- Meet Point Query
- Raw Loop Data Query
- Retrieve CSRs
- Service Availability
- TN Reservation Query (with TNSR following)

Order

- Centrex Plus
- Directory Listing Only
- Local Number Portability
- Loop with Number Portability (LNP only)
- POTS Resale
- Shared Loop
- Unbundled Loop
- UNE-P Centrex
- UNE-P POTS

PostOrder

- FOC
- Completion
- Reject
- Jeopardy
- Status Updates

The transactions above represent only a subset of the total transactions that are supported in the IMA EDI environment. Certain products that CLECs may offer to their customers may not be supported in the test environment. Therefore, SATE does not accurately and comprehensively support all of the transactions that are available in Qwest's production environment. This, potentially, prohibits CLECs from testing all of their products before migrating to the production environment.

- If a CLEC desires to test a product that is not currently supported in SATE, the additional product(s) must be requested via a Change Request (CR), through the Change Management Process (CMP). The CR is then prioritized, in accordance with the CMP. As an example, Qwest announced at a SATE Enhancement User Group meeting on November 27, 2001, that it would submit two CRs for adding Line Splitting and Loop Splitting. Once these CRs are submitted, they will need to be discussed and prioritized within the parameters of the CMP. Given the current schedule for CMP, the requesting CLEC(s) may have to wait several months for a new release before the requested products are included

² EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 7.0, Released November 9, 2001, Section 2, Implementation Activities – Progression Testing Phase, p.23.

in SATE's functionality. Therefore, the CLEC(s) cannot test all of its products for the current IMA release.

Impact:

A limited testing environment could prevent a CLEC from adequately preparing for its transition to a production environment. By not providing for testing of all of Qwest's available products in SATE, CLECs will not be able to sufficiently test all of the products that they can sell to their customers. This limitation, therefore, could negatively impact a CLEC's ability to offer products to its customers in the production environment. For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful.

Qwest Formal Response:

When Qwest initially deployed SATE, any product that a CLEC had implemented into production or was in the process of testing was included in SATE³. This ensured that when SATE was placed into production, it would support those products that the CLECs needed to be able to use SATE to migrate to the next release. Additionally, on June 29, 2001, prior to SATE deployment, Qwest conducted a CLEC meeting where the list of proposed SATE products was discussed. The CLECs⁴ expressed no concerns regarding the proposed product list. Qwest continues to support all products for which any CLEC has created a production EDI interface.

The current process for the addition of new products to SATE is for a CLEC to issue a CR through the change management process. The CR can then be processed by the CLEC community; this process ensures that Qwest is using its resources in the manner that is beneficial to the most CLECs.

Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE. However, Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP CRs to add products to SATE. Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability have recently been added to SATE, as Qwest anticipated future EDI implementations of these products. Additionally, Qwest is creating a CR for FBDL to be added to SATE, as this will be implemented as an IMA product in 9.0.

In the next SATE Users' Group Meeting on January 8, 2001, Qwest will ask CLECs to voice any concerns regarding the prioritization of new product implementations.

Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community.

KPMG Comments (01/07/2002):

KPMG Consulting acknowledges that Qwest worked with the CLEC community when initially developing SATE, and through user group meetings for continually enhancing SATE. Although SATE currently supports all products that CLECs are currently running in production, it does not support all products that a CLEC *could* run in production. A CLEC that decides to add a new product to the suite of products that it offers to its customers, but for which that product is not currently supported in SATE, must submit a CR through CMP in order to be certified to provide that service/product in production. Several major releases

³ The pseudo-CLEC was excluded when this analysis was performed.

⁴ AT&T, WorldCom, Fairpoint, Sprint, and Allegiance

of SATE may be required before the new product is then added to the test environment. This does not allow a CLEC sufficient flexibility to offer new products in a timely manner; nor does it appear to offer a test environment that adequately mirrors production environment capabilities.

Qwest stated in its response dated December 19, 2001, the following:

"Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE."

However, at the November 13, 2001 SATE User's Group Meeting, a participant requested that Line Splitting and Loop Splitting products and all associated activities be added to those supported by SATE.⁵ Qwest then drafted a CR, on behalf of the participant, to present to the CMP forum.⁶ The requesting participant may have to wait for several versions of SATE to be released before being able to test transactions associated with these products, thereby potentially placing the CLEC at a competitive disadvantage with its customers. Sudden, unexpected demand to test new products in SATE has occurred, and could occur at any point in the future, yet SATE does not support all of the products offered in production.

Qwest also stated the following in its response dated December 19, 2001:

"Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community."

The Bone Fide Request process appears to present CLECs with an option to bypass the inherent constraints of the CMP process – specifically, the need for CR prioritization that will lead to implementation. However, this process will not be fully developed until the CMP redesign is completed. Additionally, although implementation of the Bone Fide Request process may allow CLECs to pay to implement a CR, regardless of its CMP-assigned priority level, it does not alter the fact that SATE does not currently support all of the products offered in production. KPMG Consulting believes that the functionality a fully functioning test environment should mirror that of the production environment.

KPMG Consulting recommends that Exception 3095 remain open until SATE supports the products that are offered in Qwest's production environment.

Qwest Response to KPMG Comments (01/30/2002):

Qwest supports the CMP processes through which the CLECs must prioritize all new functionality, including SATE changes. The addition of a new product, either at the initiation of Qwest or a CLEC, constitutes an addition in functionality to SATE. Based upon feedback during the SATE CMP Users' Group meetings and the last CMP meeting, it appears that the CLECs want to prioritize all SATE functionality, including the addition of new products. During the January 17th CMP meeting, Qwest took an action item to further discuss the implementation of SATE prioritization at the February CMP Redesign sessions. Based upon discussions to date, Qwest and the CLEC community appear to be in agreement on this issue.

⁵ SATE Users' Group Meeting Minutes, Dated November 13, 2001, "Interoperability and SATE" section, p.1.

⁶ SATE Users' Group Meeting Minutes, Dated November 27, 2001, "Proposed CMP CRs" section, p.1; and SATE Users' Group Meeting Minutes, Dated December 4, 2001, "Proposed CMP CRs" section, p.1.

Even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment. Therefore, CLEC(s) can test all of the products for the current IMA release. Additionally, Qwest has not seen or been informed by CLECs of "sudden, unexpected demand to test new products" in SATE as stated in KPMG's First Response. While CMP CRs exist for two products to be added to SATE, no CLEC has requested an implementation of either of the products in EDI. With the availability to test within the Interoperability Test Environment and the fact that CLECs are not requesting these products be added to SATE, the impact identified in the initial release of this exception⁷ as noted below is an inaccurate statement.

Attachment(s): None

⁷ KPMG original Impact statement: "For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful."

EXHIBIT K

to AT&T's Comments on Qwest's Brief Regarding
Change Management

February 19, 2002

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Qwest agrees that, within 45 days of closing a workshop, it will update its technical publications, product catalog (also known as the IRRG), and product documentation for CLECs to reflect the agreements made in the workshop and to make Qwest's documentation consistent with its SGAT. Qwest will then submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP). When Qwest submits the documents to CICMP, Qwest will file a notice in this proceeding indicating that the documents have been updated and how to obtain copies. Qwest acknowledges that any commission order recommending that Qwest meet a checklist item will be conditioned on Qwest's compliance with this commitment.

or report

Qwest will take affirmative action following the close of a workshop to communicate to appropriate personnel to implement the agreements made in such workshops

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Qwest agrees that, within 45 days of closing a workshop, it will update its technical publications, product catalog (also known as the IRRG), and product documentation for CLECs to reflect the agreements made in the workshop and to make Qwest's documentation consistent with its SGAT. Qwest will then submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP). When Qwest submits the documents to CICMP, Qwest will file a notice in this proceeding indicating that the documents have been updated and how to obtain copies. Qwest will take affirmative action following the close of a workshop to communicate to appropriate personnel and to implement the agreements made in such workshop. Qwest acknowledges that any commission order or report recommending that Qwest meet a checklist item will be conditioned on Qwest's compliance with this commitment.

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments on Qwest's Brief Regarding Change Management**, Docket No. T-00000A-97-0238 were sent by overnight delivery on February 19, 2002 to:

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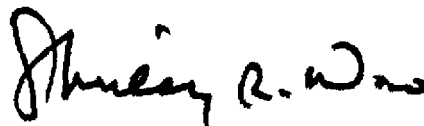
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